Registration Jacket 72007-1 Volume 3

Material to be added to an e-Jacket/Jacket

Reg. No. 72007-1

. Þ	Placement within the e-Jacket/jacket: Default: (chronological, top/newest) Description: (PDF page number, i.e., "before page 45")					
	FPL					
2. 🗆	Send to D	Data Extraction contractors this material:				
2. 🗆	Send to [Data Extraction contractors this material: Newly stamped accepted label				
2. 🗆	Send to C					

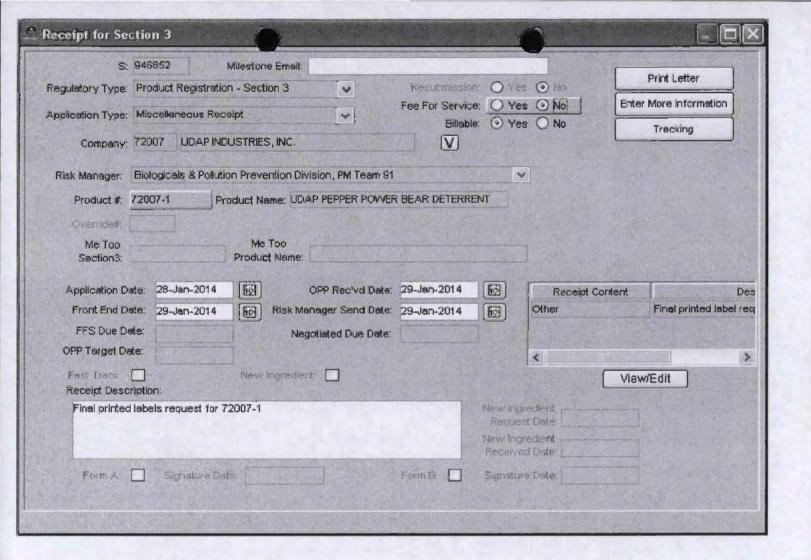
3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's name: Sylvester George

Other:

Phone: 603-0688 Division: BPPD

Date: Feb 11,2014



Please read Instructions	on reverse before impleting form.	Form /	Approv OMB No. 2070-006	5
SEPA	United States Environmental Protect Washington, DC 2	tion Agency 0460	Registration Amendment Other	OPP Identifier Number
	Applicat	tion for Pesticide - S	lection I	
1. Company/Product Nur 720 4. Company/Product (Na	07-1	Z. EPA Product Linda	Hallis -	roposed Classification
	epper lower	Blochemic	cal Posticidos	
5. Name and Address of UDAP Ind 1703 WAT Bufte, M	Applicant Include ZIP Godel Water ea, Inc. ERLINE RD. T 57701 This is a new address	6. Expedited (b)(i), my product Name (b)(ii), my product Name (b)(ii), my product Name (b)(iii), my product Name (b)(iiii), my product Name (b)(iiii), my product Name (b)(iiii), my product Name (b)(iiiii), my product Name (b)(iiiiiii), my product Name (b)(iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	Review. In accordance wit uct is similar or identical in c	
		Section - II		
Amendment - Exp Resubmission in Notification - Exp	response to Agency letter dated		rinted labels in response to // y letter deted po* Application. Explain below.	hy 29th, 2012
		Section - III		plies with pted Labeling व्याप्तिकार
1. Material This Product	Will Be Packaged In:		Continue C	1 to Open
Child-Resistant Peckagin Yes* No * Certification must be submitted	Yes No	Water Soluble Peckaging Yes No If "Yes" No. Package wgt cont	Metal Plastic Glass	U
3- Location of Net Conte	nte Information 4. Size(s) F	Retail Container	5. Location of Label Direct On Label On Labeling scco	ions mpanying product
6. Manner in Which Labo	Il is Affixed to Product Lith Pap Ster	ograph er glued heifed Section - IV	Other	
			La ve	
1. Contact Point /Comp	lete items directly below for identifice			
Name Tym Ly	nch	General 1	Manager Com	ne No. 1include Area Code) (6) 494-9292
I conify that the s I acknowledge the both under applice	Certificatements I have made on this form at any knowingly false or misleading state.	nd all attachments thereto are	true, accurate and complete. by fine or imprisonment or	6. Date Application Received (Stamped)
2. Signature	A/	General 1	Nanager	
4. Typed Name Tim Ly	inch	5. Date /-23-2	2014	

5: 921220

Material to be added to an e-Jacket/Jacket

Reg. No. 72007-1

1. ⊠	Placement within the e-Jacket/jacket: □ Default: (chronological, top/newest) □ Description: (PDF page number, i.e., "before page
.≠ •	45")

- 2. X Send to Data Extraction contractors this material:
 - Newly stamped accepted label
 - Notification
 - □ New CSF
 - Other: final Trinted Label
- 3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's name: Sylvester George

Phone: 603-0688 Division: BPPD

Date: 8 8 2012

note to Bile: Dan oction was precipitated

樂

Re: Fw: Fw: EPA Approval Request for BSK 2-2012

Dan Peacock to: Chris Pfeifer Cc: Bill Jacobs

05/30/2012 04:00 PM_

05/30/2012 04:00

Thanks for the opportunity to comment. I have listed them below...

Minimum Type Sizes with CFR citations, ver 3, 1-10-2007.doc

A. Background History of "Reliever" (allowable but NOT Included in this kit fortunately)

• Before you took over, I reviewed the different products that they wanted to include in their kit: holster, case, bike clamp, inert spray, and "reliever". I was only concerned about the "reliever" and had told the co initially that they would need acute tox and chemistry data. However, later Venus Eagle, one of our product managers, who had been involved with other kits, said that even the "reliever" would be allowed in the kit because it would be subject to regulation by another government Agency. Which one I do not know. Though I informed the co of this decision, I see that they have chosen NOT to include the "reliever". In my opinion, that's a positive development.

B. Text/Background Combinations (some hard to read)

When I reviewed their submission previously, I was concerned about some of the color combinations for text/background. If you feel that any of the "text/backgrounds" combinations are hard to read, I would have them change those combinations. Attached are the references in the CFR that give you the authority to object. This one page sheet lists the minimum type sizes and other type readability requirements and the CFR citations, which are in different locations, with every approval. It puts the colon notice of the requirements.

C. Readable Copies of Labels

 I would make sure that you receive readable copies of all labels, not just ones with 2 pt type versions that I have received on occasion that were sent via E-Mails.

D. Mention of Approved Booklet (not included with this version of kit)

In your approval, you may wish to mention the Booklet that we approved earlier and its approval date.
 You can find it 1) in the adm record and/or 2) in PPLS. That way, in one approval, you have all approved labeling, either attached to, or referenced in, the approval letter.

Thank You and good luck!,

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-308-0029

E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

Gina Storey UDAP Industries, Inc. 13160 Yonder Road Bozeman, MT 59718

MAY 2 9 2012

Subject:

UDAP Industries, Inc.; UDAP Pepper Power Bear Deterrent,

EPA Registration No. 72007-1;

Label Amendment to Add Language for Kit Sales;

D# 462940, Application Dated 3/27/12

Dear Ms. Storey:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2. Submit two (2) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(b). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions contact Chris Pfeifer at 703-308-0031 or by email at: pfeifer.chris@epa.gov. A stamped copy of the label is enclosed for your records.

Sincerely,

Linda A. Hollis, Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (7511P)

Enclosure

CONCURRENCES								
SYMBOL >	7511P							
SURNAME >	PFEIFER							
DATE >	5/33/12							

EPA Form 1329-1A/(1/90)

Printed on Recycled Paper

ACCEPTED The oppondix is in in MAY 29 2012 Conjunction with the product Robel approved 12/2/10

and Rodenticide Act, as amended, for the pesticide registered under 7a007-1

PRACTICE MAKES PERFECT SENSE!

If you have not used our products before. you should obtain this UDAP training can and practice with it until you can perform, quickly and accurately, the activities necessary to Arm, Apply and Disarm the product.

You may want to practice actually shooting from your holster with this inert can. The inert cans have the same spraying power as our regular sprays without the hot pepper. For training purposes only.

Bear Safety 1st

In a bear attack situation, we do know this: you will panic if you have not been trained ahead how you will think and react. Practice what you need to do in different attack situations. Rehearse, with friends or family various situations in order to be prepared in a real life threatening situation. Recently, a mother and her children were able to prevent a possible mauling by holding beer encounter drills with her family at home before hitting the troil.

UDAP Industries, Inc. Butte, MT 59701 www.BearSpray.com



Contains no active irritant. Practice use only.

WARNING KEEP OUT OF REACH OF CHILDREN FLAMMABLE

IRRITANT, CONTENTS UNDER PRESSURE. Do not puncture or incinerate can. Exposure to heat about 120°F (50°C) may cause bursting. Caution: Always use eye protection when being sprayed with any Inert Training Unit.



Produced by a grizzly attack survivor!

Net Contents: 7.9 ounces (225g)

DIRECTIONS

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind. Be sure to aim low because of the billowing effect of the foa.

TO DISARM: Replace safety clip as illustrated {Fig. 3}.



Item: #12-1







Fits All Registered UDAP Bear Spray Canisters

- Helps Protect against extreme temperatures! Resists Heat!
- Ideal for storage in vehicles or non-commercial aircraft.
- This container is the recommended to Store Bear Spray

Produced by a Bear Attack Survivor!



UDAP Industries Butte, MT 59701

(800)-232-7941

BearSpray.com



Appendix A Page 2 of 2

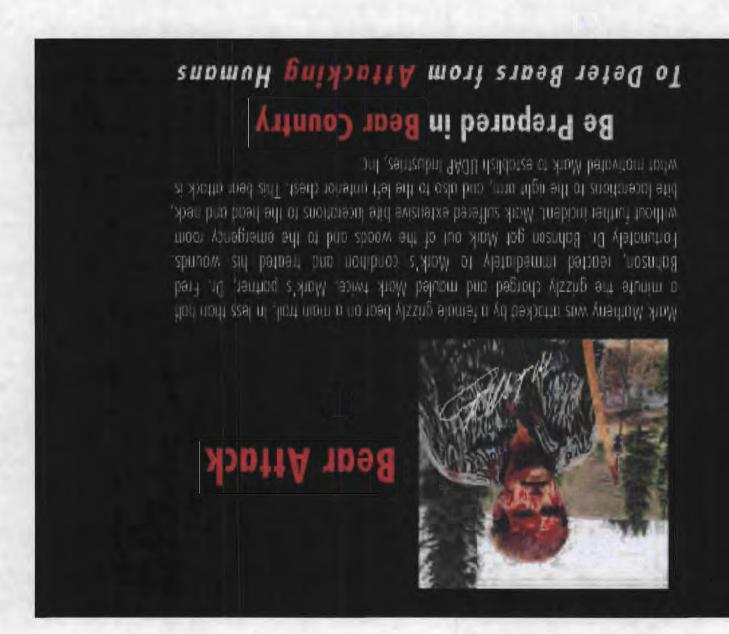


Appendix B Page 1 of 6



Appendix B Page 2 of 6

Appendix B Page 3 of 6



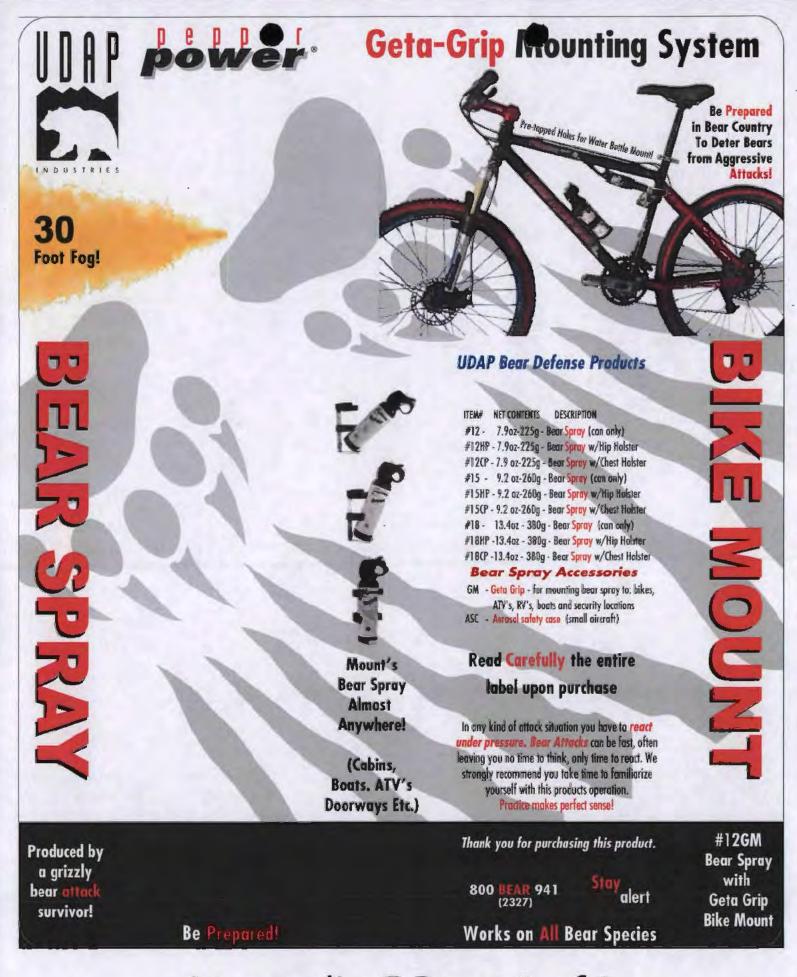


Appendix B Page 4 of 6



Appendix B Page 5 of 6







Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main troil. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country
To Deter Bears from Attacking Humans

Read Carefully the entire label upon purchase
Do NOT store in Hot vehicle or in direct sunlight

Geta-Grip Mount's Bear Spray Almost Anywhere!



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET CLUDED

DANGER: May cause interestible physical eye durings if sprayed in the eye. Contact through touching or nubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash throughly with soop and water after handling. Remove contaminated dathing, and wash clothing belore reuse.

FIRST ALD

Have label with you when attaining treatment advice

Have label with you when attraining freatment advice IF ON SKIN OR CLOTHING: Take all contaminated dathing. Rinse skin immediately with plenty oil water for 15—20 minutes. Call a poison control renter, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EVES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove control lenses, if present, ofter the lists 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 investigably for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material

PHYSICAL OR CHEMICAL HAZARDS Contents under pressure. Do not use or store near heat or open

flome. Do not punction or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hat vehicle w in direct sunlight.

Spills: Call 1-800-535-5053 for Chemical Emergency. Disposal: Do not incinerate or puncture

If empty: Do not reuse empty container. Place in trash at affer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclarimer: To the extent allowed by low, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or hability to use this product. Corriect local law enforcement officials about regulations concerning this product. Note: As part of an ongoing measured project, UDAP Industries needs your true account of UDAP Papper Power" use against bear attacks. Please call 1-800-232-7941 for defauls.

DIRECTIONS FOR USE

BEAR IN MIND

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on dothing. Such use has no determent effect on bears. Keep safety dip in place except when practicing with or using the product. Do not not or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with cuttion. Contents will cause point and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from assima or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size].

This product has a range of up to 30 feet [260g, 225g size].

This constar emplies completely in approximately 7 seconds [380g container],

5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION OIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety dip to disarm the container. Before toking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-like litts container, do so with your back to the wind in an area away from people and bears. Do not test-like Peoper Power in a no area where you plan to camp, hunl, hits, or ish. Do not test-like for more than a half a second. After test-living, clean nazzle and can with soap and works to remove residue. If you have not used this product before, you should obtain a URAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

To ARM AND APPLY: Place forefinger through loap in handle with frumb on cut of safety dila Fig. 1). With

asserted in the country below.

TO ANN AND APPLY Place forefinger through loag in handle with thurnb on cust of safety clip (Fig. 1). With humb, poll sofety clip up and straight back. This will expose the imager lever. Depress trigger lever with humb, releasing a 1 second burst of sproy (Fig. 2). This should be done as the attacking bear is changing toward you and is about 40 feet away (2-3 seconds hum reaching you). Be aware that wend or roin can greatly affect the accuracy of the infibil burst of spray. In some cases, you may have to work until the bear is quite close before spraying. If the bear makes it through the infibil burst of spray, continue spraying, drawing for the face. Shield your eyes and loce if you must face the wind.

TO DISARM: Replace safety clip as Illustrated (Fig. 3).



Capsaicin & Related Capsaiciniods

2.0%

BEAR SPRAY with BIKE MOUNT



Inert Traning Canister Practice Makes Perfect Sense!

#1 2IP Bear Spray with Hip Holster and Inert Training Can

> Shoot from the holster design!

Ilf power

30 Foot Fogl

BEARS

UDAP Bear Defense Products

#12+ 7.90z-225g - Bear Spray (can only)
#12HP - 7.90z-225g - Bear Spray w/Hip Holster
#12CP - 7.9 oz-225g - Bear Spray w/Hip Holster
#15 - 9.2 oz-260g - Bear Spray w/Chest Holster
#15 - 9.2 oz-260g - Bear Spray w/Hip Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#18CP - 13.4oz - 380g - Bear Spray w/Hip Holster
#18CP - 13.4oz - 380g - Bear Spray w/Hip Holster
#18CP - 13.4oz - 380g - Bear Spray w/Hip Holster
#18CP - 13.4oz - 380g - Bear Spray w/Hip Holster

Bear Spray Accessories

GN - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We swongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

Produced by a grizzly bear attack survivor!

Be Prepared!

800 BEAR 941 (2327) Stay

Works on All Bear Species



Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite locerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries. Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Hymans

Read Carefully the entire label upon purchase Do NOT store in Hot vehicle or in direct sunlight

Hip Holster Included

Shoot from the Holster designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET .UDED

DANGER: May cause irreversible physical eye domage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye joury. Avoid contact with skin or clothing. Wash thoroughly with soop and water after handling. Remove contaminated clothing and wash clothing before reuse.

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTKING: Take off contaminated dothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for

IF IN EYES: Hold eye open and rinso slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material

PHYSICAL OR CHEMICAL HAZARDS

Contents under gressule. Do not use at store near heat or open flame. Do not puncture or incinerate containes. Exposure to temperatures above 130° F may rouse bursting.

STORAGE & DISPOSA

STORE IN A COOL DRY PLACE TNACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not rouse empty container. Place in hosts or offer for recycling if available. If partially filled: (all your local solid waste agency for disposal instructions

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, bas, direct or consequential including death arising out of the use of, or insulity to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an anguing research project, UCAP Industries needs your true account of UCAP Proper Power use against bear attacks. Please call 1-800-232-7941 for

DIRECTIONS FOR USE

BEAR IN MIND

It is a violation of Federal law to use this product in a morner inconsistent with

its lobeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no determent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size].
This conister empties completely in approximately 7 seconds [380g container]. 5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION OUR ECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety dip to discret the container. Before taking this product his bean country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Peoper Power in an onea where you plan to comp, from Jude, or lish. Do not test-fire from more than a half a second. After test-firing, clean nazzle and can with soop and water to remove residue. If you have not used this graduat testing, you should obtain a UDA' training can and practice with it until you can perform, quintly and accordably the activities accorded in the column below.

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TO DISARM: Replace screen clip as illustrated (Fig. 3).



Capsaicin & Related Capsaiciniods

BEAR SPRAY WITH INERT TRAINING CAN





30 Foot Fog

BEAR SPRA

EPA Accepted Complies with

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION #12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Hokter #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP -13.4oz - 380g - Bear Spray w/Hip Holster #18CP - 13.4oz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boots and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Thank you for purchasing this product

#12HPIP Bear Spray with Hip Holster and Inert Training Can

> Shoot from the holster design!

Produced by a grizzly bear attack

survivor!

Be Prepared!

(2327)

alert

Works on All Bear Species

Front

800 BEAR 941



Mark Matheny a arizzly bear attack survivor

Mark Watheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bohnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite locerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

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Hip Holster Included

Shoot from the Hoister designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)



product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an angoing research project, UDAP Industries needs your true account of UDAP Pepper Power use against bear attacks. Please call 1-800-232-7941 for

BEAR IN MIND FREE BEAR SAFETY TIPS BOOK ST INCLUDED

RECAUTIONARY STATEMENT HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temperary eye injury. Avail contact with skin or clothing. Wash thoroughly with soop and water after handling, Remove contaminated dothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING: Take off contaminated clathing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a paison control center, doctor, or 1-800-858-7378 immediately for

IF IN EYES: Hold eye open and rinse slowly and gently with water for 75-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a paison control center, doctor, or 1-800-858-7378 immediately for trentment ndvice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container, Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehide or in

Spills: Coll 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO MOT INCIMERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this

DIRECTIONS FOR USE It is a vialation of Federal law to use this product in a manner inconsistent with its labeling

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to allack humans. Do not seek out encounters with bears or intentionally provoke them. This

product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be esten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This consister empties completely in approximately 7 seconds [380g container], 5.4 seconds (260g container), 4 seconds (225g container),...

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety slip to discurn the container. Before taking this product into bear country, rend the directions and formiliarize yourself with these procedures. If you test fire this container, do so with your back to the wind in an area away from people and bears. Do not test-lire Pepper Power" in an area where you plan to comp, hunt, hike, or fish Do not test-fire for more than a half a second. After test-fring, clean nozzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until

you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety dip (Fig. 1). With thumb, pull safety dip up and straight back. This will expose the trigger lever. Decress irrigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging this should be done as the obsciously bear is charging toward you and is about 40 feet drug 12.5 seconds from reaching year). Be more than wind or rain con greatly effect the accuracy of the mistal burst of spray. In some cases, you may move to we'll until the bear is quite close before spraying if the bear independent of the ince. Shield your eye and face if you must face the wind.

TO DISARM: Replace safety clip as illustrated (Fig. 3).

....











Related Capsaiciniods



30 Foot Fog

BEAR SPRAY



#12 - 7.9oz-225g - Bear Spray (can only)
#12HP - 7.9oz-225g - Bear Spray w/Hip Holster
#12CP - 7.9 cz-225g - Bear Spray w/Chest Holster
#15 - 9.2 cz-260g - Bear Spray w/Chest Holster
#15 - 9.2 cz-260g - Bear Spray w/Chest Holster
#15CP - 9.2 cz-260g - Bear Spray w/Chest Holster
#15CP - 9.2 cz-260g - Bear Spray w/Chest Holster
#18 - 13.4cz - 380g - Bear Spray w/Chest Holster
#18CP - 13.4cz - 380g - Bear Spray w/Chest Holster
#18CP - 13.4cz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: tilkes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sensel

Thank you for purchasing this product.

#12HPIP Bear Spray with Hip Holster and Inert Training Con

> Shoot from the holster design!

Produced by a grizzly bear attack survivor!

Be Prepared!

800 BEAR 941 (2327) Stay alert

Works on All Bear Species

Front



Bear Attack

Mark Matheny
u grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than helf a minute the grizzly charged and mouled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear ettack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country
To Deter Bears from Attacking Humans

Read Carefully the entire label upon purchase

Do NOT store in Hot vehicle or in direct sunlight

Hip Holster Included

Shoot from the Holster designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)



BEAR SPRAY WITH INERT TRAINING CAN



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause invoversible physical eye damage it sproyed in the eye. Contact through touching at nubbling eyes may result in substantial but temporary eye injury, Avoid contact with skin or clothing. Wash thoroughly write soup and water after handling. Remove contaminated dathing and wash dathing before reuse.

FIRST ALO

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15—20 minutes. Call a paison control center, dactor, or 1-800-858-7378 immediately for heatment advice.

IF IN EVES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, offer the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use ar stere near beat or open flame. Do not punchine ar incinerate container. Exposere to temperatures above 130° Firmy cause buisting.

STORAGE & DISPUSAL

STORAGE: STORE IN A COOL, ORY PLACE INACCESSIBLE TO CHEDREN AND PETS. Do not store in places where the remperature is above 120°F or below 32°F. Do not store in hal vehicle or in direct sufficient.

Spills: Call 1-800-535-5053 for CheanCal Emergency. Disposal: Do not incinerate or puncture

If empty: Do not reuse empty container. Place in trash or offer for necycling if available. If partially filled. Call your local solid waste agency for disposal instructions.

Dischairment: To the extent allowed by low, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inchility to use this product. Contact local low enforcement officials about regulations concerning this product. Note: As part of an anguing research project, UDAP Industries needs your true account of UDAP Pagger Power* use against bear attacks. Please call 1-800-232-7941 for details.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or an clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when procticing with or using the product. Do not eat or allow to be esten proficed or feed materials which may have become contaminated with this product. Use with courion. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size].
This product has a range of up to 30 feet [260g, 225g size].
This consister amplies completely in approximately 7 seconds [380g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety dip to disarm the container, Before taking this product into bear country, read the directions and farniliarize yourself with these procedures. If you test his this container, do so with your back to the wind in an area away from people and bears. Oo not test-hire Peoper Power in an area where you plan to camp, hunt, take, at fish, Do not test-like for more from a half a second. After test-fixing, clean nazzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP maining can and practice with it until

you can perform, quickly and accurately, the activities described in the column below.

5.4 seconds [260g container], 4 seconds [225g container],.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety dip (Fig. 1). With thumb, gull solely dip up and straight back. This will expose the trigger lever. Depress frigger lever with thumb, eleasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging roward you and is about 40 leet may (2) seconds from reaching you). He avone those wind or rain can greatly after the occurry of the initial burst of spray, in some raiss, you may have to wait until the bear is quite close before spraying. If the beat makes if through the latter, shill be prough the latter. Shield your eyes and face it you must face the wind.

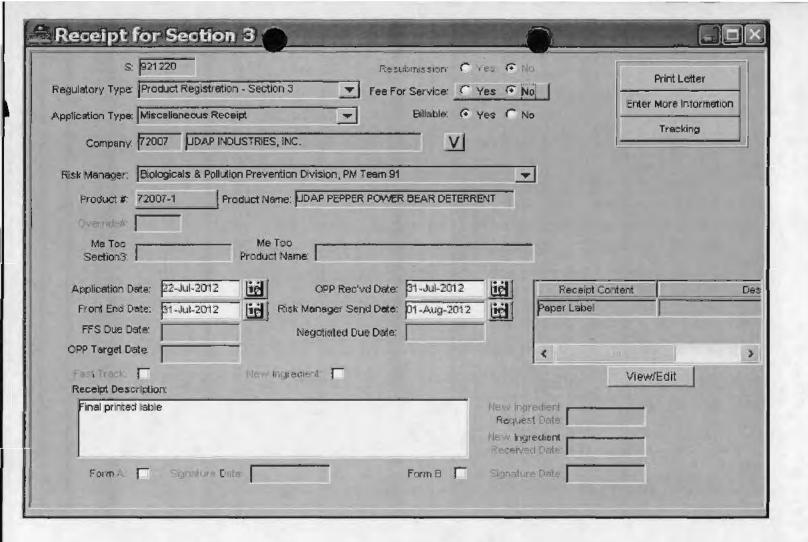
TO DISARM: Replace safety clip as illustrated (Fig. 3),





BACK

Related Capsaiciniods



Dew 2

UDAP Industries Inc. 1703 Waterline Road Butte, MT 59701 406-494-9292

July 22, 2012

EPA Registration Number 72007-1

Linda A. Hollis Biochemical Pesticide Branch Prevention Division (7511P) 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

RE: UDAP Pepper Power Bear Deterrent EPA Registration Number 72007-1 Submission of final approved labeling for sale in retails stores.

Dear Linda A. Hollis,

Included are 2 copies each insert ready for file of final approved labeling.

Sincerely,

Tim Lynch UDAP Industries Inc. Email: Faxes@udap.com



30 Foot Fog!

Works on All Bear

Species

Appendix B Page 3

HOLSTER WITH PINK BELT



Be Prepared

UDAP's "Shoot from the Holster" designs!

EPA Accepted Labeling

UDAP Bear Defense Products HE HET CONTENTS DESCRIPTION #12 - 7.90z-225g - Bear Spray (con only)

#12HP - 7.95z-225g - Bear Sprey w/Hip Holster #15 - 9.2 oz-260g - Near Spray (can only) #15HP - 9.2 az-260g - Bear Spray w/Hip Holsaer

#1 SCP - 9.2 az-260g - Bear Spray w/Chest Holster

| #18 - 13.4 az-3800g - Bear Spray (can only) | #18HF - 13.4 oz-3800g - Bear Spray w/Hip Holster | #18CP - 13.4 oz-3800g - Bapr Spray w/Chest Holster

Bear Spray Accessories

JGM - Geta Grip - for mounting bear spray to: bikes, ATY's, RY's, boots and security locations #ASC - Aerosol sofety case (small aircraft)

Read Carefully the entire label upon purchase

To Deter Bears from Aggressive Attacks!

in any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.
Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327)

Stay alert

BE PREPARED!

#12 PINK

26

30 Foot Fog!

Appendix B Page 3

Works on All Bear Species

BEAR SPRAN

#12 PINK



UDAP Bear Defense Products

ITEM HET CONTENTS DESCRIPTION #12 - 7.9az-225g - Bear Spray (can only)

#15 - 9.2 oz-260g - Beer Sproy (con only) #15HP - 9.2 oz-260g - Beer Sgray w/Nip Holster #05CP - 9.2 oz-260g - Beer Spray w/Chest Holster

#18 - 13.4 oz-3800g - Bear Spray (con only) #18HP - 13.4 oz-3800g - Bear Spray w/Hip Holsler #18CP - 13.4 oz-3800g - Bear Spray w/Chest Holster

#GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boots and security locations #ASC - Aerosol sufery case (small aircraft)

Read Carefully the entire label upon purchase

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Thank you for purchasing this product.

800 BEAR 941

To Deter Bears from Aggressive Artacks

Stay alert

UDAP's "Shoot from the Holster" designs!

BE PREPARED!

#12HP - 7.9az-225g - Bear Spray w/Nip Halster

Bear Spray Accessories

Practice makes perfect sense!

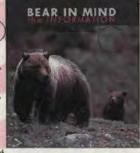


Majik Mohemy was altexted by a female gizzly beer on a main trail. In less than half a minute the gizzly chaged and mouled Mark hairs. Mark's partner, Dr. Fred Bohnson, reacted immediately to Work's condition and treated his wounds. Forkmotely Dr. Balmeson got Mark out oil the woods and to the remergency reason without hurteer incident. Mark suffered antensive bits locarobons to the head and neck, bits locarobons to the right own, and also to the lift consense chest. This bear attract is what momented Mark to establish

Be Prepared in Bear Country

For a limited time, the safety wedge will glow in the dark .

To provent loss, the safety wedge is attached to the handle, please lowe artached.



Most Bear Attacks Involve a Mother with Cub(s)

30 FOOT FOG





DIRECTIONS FOR USE

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in all matures microscident with its lending.

USE RESTRICTIONS: This graduat may be used only it defer bears which are underlong or appear fidely to effect hommes.

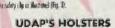
It is not seeked in recounters with bears or inharitationally previde them. This product may not be offserion in all catestons or provider all impairs. One may sarrey this product on home, there objects, or an defining. Such use less moderness diffict on home. Keep adoly, the in place except when practicing which are using the product. Do not not or allow to be even only food or feed methods which may know become continuented with the papalet. Use with counter, Lordon and keep, Individuals who suffer from softmen are emphysioned may have a more evere exciton.

This product less a cauga of up to 39 foot (9 maters).

This constant amplies combatally in representably 4 seconds (225s; extension) 5.4 seconds (260g continue).

restabling? 5 of same interference in the followed for time the continue, topoly the product, and include the rather, the his down the continue, topoly the product, and include the rather, the his down the rectinue, the less in bloom the southware facilities though the southern to be account, and the country and familiar to receive facilities though so and on the second continue the receiver families of the receiver families and concentrately, the continue described in the relation to such discharge (fig. 1). With the receiver families the rece

Replace salely also as illustrated (Fig. 1).



Shoot from the Holster designs, providing silent and

easy access to the trigger.

Item #12PINK

679354 00079-2 USE UPC



Read Do NOT store in Hat vehicle or in direct swaligh Carefully the entire label upon purchase

Deter Bears from Attacking Humans

BE PREPARED!

UDAP Industries Butte, MT 59701 866 BEAR 941

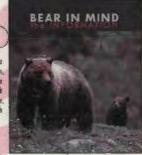


tagiv Melhany a grizzly boar affack surviva

What, Michany was almosted by a handle gazzly bear on a major half, in less than half a minute the gazzly charged and maded Wark naive. Mark's yearner, Dr. Paud Bohnson, resized immediately to Mark's condition and treased his wounds. Facksoning Dr. Behnson got Work out of the woods and to the emergency rosso without further incident. Mark suffered extensive bits legeratures to the hand and note, bits linearities to the light own. and also to the left annaior chest. This bear alread is what makened Mark to establish

Be Prepared in Bear Country

For a limited time, the safety wedge will give to the back. To present here attached, to attached to the backs, please here attached.



Most Bear Attacks Involve a Mother with Cub(s)

30 FOOT FOG



For use on Al Bear Species

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with

It is a violation of Federal lear to use this product in a manner reconsistent with Scholing.

USE RESPICATIONS: This product may be used only to deter hiers which are attacking or appear likely to attack homeon.

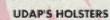
De not seek out of encounters with home or introduceally provoke them. This product may not be effective in all situations or provent all impairs. De not spray this product as lends, other objects, or an defining. Such oue has the determent which rebours. Keep surfay, of an place except when practicing with or using the product. Both one entire is dealer to the entire the product the not ent or allow to be entire into product the without an entire to the product the with counter. Controlls what cause pain and hemporary impairities it is type, likes, month and length briddenic who surfar, from each man or amplification may have be used in the surfar from each man or amplification may have be more severe too than.

This product has a range of up to 30 feet (Finebure).

This contains amption completely in improvimentally 4 months [205g container] 5 4 seconds [360g container].

APPLICATION DIRECTIONS. Speed processes, may be followed to contribut continue requity the product; out sectors the orders of it does the continue requity the product; out sectors the orders of the destroation of the continue requity the product; or sectors the orders and contributed the contributed of the contribut

Leaks a safety also as allocated (Fig. 3).



Shoot from the Holster designs, providing silent and easy access to the trigger.

Item #12PINK

679354 00079-2 USE UPC

PINK Hip Holster and Belt



Read Do NOT store in Hot vehicle or in direct sunlig Carefully the entire label upon purchase

6 **Deter Bears from Attacking Humans**

BE PREPARED!

UDAP Industries Butte, MT 59701 866 BEAR 941

.

UDAP



Geta-Grip Mounting System



30 Foot Fog!

EAR SPRA



(Cabins, Bouts, ATV's Doorways Etc.) **UDAP Bear Defense Products**

ITEM# NET CONTENTS DESCRIPTION #12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP-13.4oz - 380g - Bear Spray w/Hip Holster #18CP - 13.4oz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations

ASC - Aerosol safety case (small aircraft)

Read carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sensel

Produced by a grizzly bear attack survivor!

Be Prepared!

Thank you for purchasing this product.

800 BEAR 941 (2327)

alert

Works on All Bear Species

#12GM Bear Spray with Geta Grip **Bike Mount**

MOUNT



Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the arizzly charged and mouled Mark twice. Mark's partner, Dr. Fred Bohnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson act Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

Rend carefully the entire label upon purchase Do NOT store in hot vehicle or in direct sunlight

Geta-Grip Mounts **Bear Spray** Almost Anywhere!



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET INCLUDED

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or dothing. Wash thoroughly with soop and water after handling.

Remove contaminated clossing and wash clothing before reuse.

Have label with you when obtaining treatment advice IF ON SIGN OR CLOTHING: Take off contominated durling. Rinse skin immediately with plenty of water for 15-20 minutes. Coll a

poison control center, doctor, or 1-800-858-7378 immediately for

IF IN EVES: Hold eye open and rinse slowly and gently with water for P5-20 minutes. Remove contact lenses, if present, other the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-852-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHIEDREN AND PETS. Do not store in places where the temperature is above 320°F or below 32°F. Do not store in hot vehicle or in

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY.

DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container, Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Dischainson: To the extent allowed by law, UCAP ladustries, Inc. shall not be liable for durnage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enfancement officials about regulations concerning this product. **Note:** As part of an ongoing research project, UDAP ladustries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its lobeling

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with boars or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not presure many not be entertive in a shouldn't or prevent an liquides. Do not spray this product on lents, other objects, or on dothing. Such use has no deterront effect on bears. Keep sofely clip in place except when practicing with or using the product. Do not eat or allow to be enten any food or feed materials which may have become contaminated with this product. Use with coution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphyserna may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This conister empties completely in approximately 7 seconds (380g container),

5.4 seconds [260g container], 4 seconds (225g container),

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and testore the safety dip to disarm the container. Before taking this product into bear country, read the directions and fornillarize yearself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power* in an area where you plan to comp, hust, take, or fish. Do not test-fire for more than a half a second. After test-firing, clean nazzle and can with soop and water to remove residue. If you have not used this preduct before, you should obtain a UDAP training on and practice with it until you can perform, quickly and accurately, the activities described in the column below.

described in the column below.

10 ARM AND APPLY. Place forefinger through loop in handle with thumb on our lat safety clip (Fig. 1). With themb, just safety clip up and straight back. This will expose the higger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be dose as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from repulsion you). He means that wind or rate can toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or roth can greatly effect the occurrey of the initial burst of spray. In some cases, you may have to varie until the bear is quite close before coroving. If the bear milkes through the initial burst of spray, continue spraying, riming for the fore. Shield you eyes and foce if you must face the wind.

TO DISAMIR Repute Solety clo as illustrated Fig. 3)

....

#12GM -Bear Sproy w/ Moun

Related Capsaiciniods

BEAR SPRAY with BIKE MOUNT



WIAP TA

UDAP power.

Geta-Grip Mounting System



30 Foot Fog!

BEAR SPRA

Produced by a grizzly bear attack survivor!

Be Prepared!

UDAP Bear Defense Products







Mounts Bear Spray Almost Anywhere!

(Cabins, Boats. ATV's Doorways Etc.) #12 · 7.90z-225g · Bear Spray w/Hip Holster
#12CP - 7.9 oz-225g · Bear Spray w/Hip Holster

#15 - 9.2 oz-260g - Bear Spray w/cliest noise #15 - 9.2 oz-260g - Bear Spray w/Hip Holster

#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP - 13.4oz - 380g - Bear Spray w/Hip Holster

#18CP -13.40z - 380g - Bear Spray w/Chest Holster Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosal safety case (small aircraft)

Read carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes per ect sense.

Thank you for purchasing this product.

800 BEAR 941

alert

Works on All Bear Species

#12GM Bear Spray with Geta Grip Bike Mount

MOUNT



Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Br. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the amergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country
To Deter Bears from Attacking Humans

Read carefully the entire label upon purchase

Do NOT store in hot vehicle or in direct sunlight

Geta-Grip
Mounts
Bear Spray
Almost
Anywhere!



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET INCLUDED

DATIGER May cause treversible physical eve damage if sprayed in the eye. Contact through touching as rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Worth theroughly with soap end water after handling. Remove contaminated clothing and west clothing before reuse.

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off contominated skithing. Rinse skin immediately with plenty of water for 15—20 minutes. Call a poison control central, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, ofter the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-803-858-7378 immediately for treatment arbitrary.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flome. Do not grancture or incinerate contriner. Exposure to temperatures above 130° F may course bursting.

STORAGE & DISPOSAL

STORAGE STORE IN A COOL, ORY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. On not store in hot vehicle or in dreet sunlight.

Spills: Call 1-800-535-5053 for Chemical Emergency. Disposal: Do not inciderate or puncture

If empty: Do not reuse empty container. Place in trash or after for recycling if available, it partially filled; Call your local solal waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inobility to use this product. Context local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pappor Power® use against beer attacks. Please call 1-800-232-7941 for details.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on elothing. Such use has no deterrent effect on bears. Keep safety (by in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coultion. Contents will cause point and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size].
This product has a range of up to 30 feet [260g, 225g size].
This constant amplies completely in approximately 7 seconds [380g container],
5.4 seconds [260g container], 4 seconds [225g container].

APPLICATION GIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and lamillarize varusell with these procedures. If you test-file this container, as with your back to the wind in an area away from people and bears. Do not test-file Papper Power in an area where you plan be comp, hunt, this, or hish. Do not test-fire for more then a half a second. After test-firing, clean nazzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and prostice with it until you can perform, quickly and accurately, the activities

described in the column below.

TO ARM AND APPLY: Place forefinger through loop in heralle with thumb on out of safety dip (Fig. 1). With thumb, pull safety dip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing at 1 second burst of spray (Fig. 2). This should be done as the attacking bear is changing toward you and is about 40 feet away (2/3 seconds from reaching you). Be aware that wind on rain can greatly offect the accuracy of the mittal burst of spray in some cases, you may have to evaluant the hear is quite close before spraying, if the bear makes at through the initial burst of spray, continue spraying, girning for the face, wineld your over and face if you must face the wind.

ine rouse, centeric year eyes and roue in you-mast race wind. 10 DISARAM Replace salety clip as illustrated (Pg. 3).

#12GM-Bear Spray w/ Mount

Capsaicin & Related Capsaiciniods

2.0%

BEAR SPRAY with BIKE MOUNT



E S R

UDAP Bear Defense Products

#12 - 7.9az-225g - Bear Spray (can only)
#12HP - 7.9az-225g - Bear Spray w/Hip Holster
#12(P - 7.9 az-225g - Bear Spray w/Chest Holste
#15 - 9.2 az-260g - Bear Spray w/Chest Holster
#15(P - 9.2 az-260g - Bear Spray w/Hip Holster
#15(P - 9.2 az-260g - Bear Spray w/Chest Holster
#15(P - 9.2 az-260g - Bear Spray w/Chest Holster
#18 - 13.4az - 380g - Bear Spray w/Hip Holster
#18 - 13.4az - 380g - Bear Spray w/Hip Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosel safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Proving makes perfect social

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

HOLSTERS

30 FOOT FOG SPRAY

Capsaicin & Related Capsaiciniods

Item # V2P

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with scap and water after handling. Remove contaminated clothing and wash dothing before teuse.

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a paison control center, doctor, or 1-800-858-7378 immediately for meatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

On not apply directly to water, Do not containingte water by disposing of uniosed material. PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use ar store near heat or open flame. Do not puncture or incinerate container. Exposure to remperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORE IN A COOK, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the remperature is above 120°F or below 32°F. Do not store in hot webide or in direct sunlight

Spills: Call 1-800-535-5059 For CHEMICAL EMERGENCY.

If empty: Do not reuse empty container. Floce in trash or affer for recycling if available. If partially filled: Cult your local solid waste agency for disposal instructions.

Disclarimer: To the extent allowed by low, UDAF Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Holler As part of an angoing research project, ADAP Industries needs your true excount of UDAP PepperPower" use against bear attacks. Please call 1-800-232-7941 for details.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all shutters or prevent all injuries. Do not sprey this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with a using the product. Do not ear or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coulion, Contents will couse pain and temporary impairment to eyes, nose, mouth and longs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters). This consister emplies completely in approximately 4 seconds [225g container] 5.4 seconds [260g container]

APPLICATION DIRECTIONS Special procedures must be followed to arm the container, apply the product, and restore the safety dip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire PapperPower in an area where you plan to comp, hunt, hike, or fish. Do not testfire for more than a half a second. After test-firing, clean nazzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP haining can and practice with it until you can perform, quickly and accorately, the activities described in the

16 MIM MID APPLY Place forefinger through loop in bondle with thumb on cut of safety dip (Fig. 1). With thumb, poll safety dip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reacting you). Be aware that wind at rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite clase before spraying. If the bear makes it through the initial burst of spray, continue spraying, alming for the face. Shield your eyes and face if you must face the wind. TO DISARM. Replace safety clip as illustrated. (Fig. 3).



Capsaicin & Related Capsaiciniods

2.0%

BEAR SPRAY 2 PACK



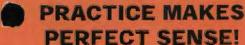
Appendix E - Page 2 of 2



R

R





AND HOLSTER INCLUDED

UDAP Bear Defense Products

Bear Spray Accessories

GM Geta Grip for mounting bear spriny to: bikes ATV's, RV's, boots and security locations ASC - Aerosol sufety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sensel.

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

FOOT FOG SPRAY

Capsaicin &
Related Capsaiciniods

Item #

PRECAUTIONARY STAY NAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER. May cause ineverable physical eye damage if sprayed in the eye. Contact through teaching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or deliving. Wash thoroughly with soup and water ofter handling. Remove contaminated dolhing and wash dothing before reuse.

Have label with you when obtaining treatment advice

IF ON SKIN ON CLOTHING Take off contaminated dratting. Ruse skin immediately with plenty of water for 15-20 minutes. Call a paison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eye open and rinse slewly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue missing eye. Call a paison control center, doctor, or 1-800-858-7378 immediately for treament advice.

Do not apply directly to water. Do not contaminate water by disposing of unused material

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open florne. Do not ponctions or indinerate container. Expasure retemperatures above 130" F may cause bursting.

STORAGE & DISPOSAL

STORAGE STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in direct conlight.

Spills: Coll 1-800-535-5053 for CHEMICAL EMERGENCY DISPOSAL. DO NOT INCINERATE OR PUNCTURE

If empty, Do not reuse empty container. Place in trash or affer for recycling if available. If partially filled: Call your local solid weste agency for disposel instructions.

Disclaimer: To the extent aboved by law, ADAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death assing out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Motor its part of an origing research project, UDAP industries needs your true account of UDAP PepperPower* use against bear attacks. Please call 1-800-232-7941 for details.

DIRECTIONS FO

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking at appear likely

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on dothing. Such use has no deterrent effect on bears. Keep safety this in place except when practicing with as using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coution. Contents will cause pain and temporary impartment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 fact (9 meters). This conistor amphas completely in approximately 4 seconds (225g container) 3.4 seconds (260g container).

APPLICATION DIRECTIONS: Special procedures must be followed to own the container, apply the product, and restore the salety clip to discern the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire PeoperPowerTM in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and occurrently, the activities described in the column below.

TO ARM AND APPLY: Place forelinger through loop in handle with thumb on curl of safety dip. [Fig. 1]. With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 7). This should be done as the attacking bear is charging reward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite dose before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face, Shield your eyes and face if you must face the wind. TO DISARM: Replace safety clip as



2.0%

BEAR SPRAY
WITH TRAINING CANISTER



Appendix F - Page 2 of 2

IH power

Bear Pepper Spray



Works on All Bear Species

To Deter Bears from Aggressive Attacks!

Prepared in Bear Country

UDAP Bear Defense Products

| TEM# | NET CONTENTS | DESCRIPTION | #12 - 7.90z-225g - Bear Spray (can only) | #12HP - 7.90z-225g - Bear Spray w/Hip Holster

#15 - 9.2 az-260g - 8ear Spray (can only) #15HP - 9.2 az-260g - 8ear Spray w/Hip Holster #15CP - 9.2 az-260g - 8ear Spray w/Chest Holster

#18 - 13.4 oz-3800g - Bear Spray (can only) #18HP - 13.4 oz-3800g - Bear Spray w/Hip Holster #18CP - 13.4 oz-3800g - Bear Spray w/Chest Holster

Bear Spray Accessories

#GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations #ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

Be Prepared!

UDAP's "Shoot from the Holster" designs!



Bear Spray with Pink Camo Hip Holster and Belt







Works on All Bear Species

BEAR SPRAY

#12PPINK

Se Prepared in Bear Country

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION
#12 - 7.9oz-225g - Bear Spray (can only)
#12HP - 7.9oz-225g - Bear Spray w/Hip Holster

#15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster

#18 - 13.4 oz-3800g - Bear Spray (can only) #18HP - 13.4 oz-3800g - Bear Spray w/Hip Holster #18CP - 13.4 oz-3800g - Bear Spray w/Chest Holster

Bear Spray Accessories

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Read Carefully the entire label upon purchase

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Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay

Bear Safety Tips Booklet Included!

Appendix G Page 2 of 4



Hip Holster with Belt

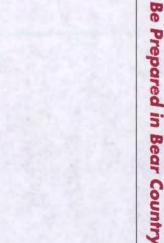
UDAP's "Shoot from the Holster" designs!

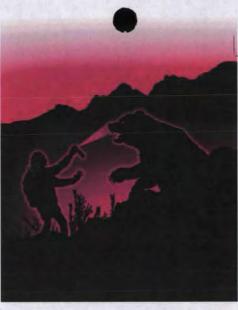


30 Foot Fog!

Works on All Bear Species

BEAR SPRAY





UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION
#12 - 7.90z-225g - Bear Spray (can only)
#12HP - 7.90z-225g - Bear Spray w/Hip Halster

#15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster

#18 - 13.4 oz-3800g - Bear Spray (can only) #18HP - 13.4 oz-3800g - Bear Spray w/Hip Holster #18CP - 13.4 oz-3800g - Bear Spray w/Chest Holster

Bear Spray Accessories

#GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations #ASC - Aerosol safety case (small aircraft)

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Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay



UDAP's "Shoot from the Holster" designs!

#12PPINK



BE PREPARED!

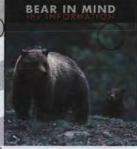
Apendix G Page 3 of 4

Bear Attack

Mark Matheny was attacked by a female grizzly beer on a main trail. In less than half a minute, the grizzly charged and mouled Mark twice. Mark's portner, Dr. Fred Bohnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite locarations to the head and neck, bite locarations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish INDER between

Be Prepared in Bear Country

for a limited time, the safety wedge sell glave in the dark . To prevent less, the safety wedge is attached to the hendle, please leave attached.



Most Bear Attacks Involve a Mother with Cub(s)

30

FOOT FOG

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with

It is a violation of Federal low to use this product in a manner inconsistent with its babling.

USE RESTRICTIONS: This product may be used only to deter bears which are entacking or appear likely to efforch humans.

Do not seed out recounters with bears or intentionally provake them. This product may not be effective in all situations or prevent all implies. Do not sprey this product on tents, other objects, or on clothing. Soch use has 50 determent effect on bears. Keep suffer day in place except when practicing with our using the product. Do not eat or allow to be either any food or feed matericle which may have become continuated with this populact. Use with custom. Contents wit cause pain and temporary implement to eyes, tesse, mouth and lungs, individuals who saffer hearn earliest or anaphyseme may have or more service recordin.

This product him a range of up to 30 feet (9 meters).

Commission 3.4 seconds (200g commisser).

APPLICATION DIRECTIONS: Speeds procedures must be followed to orm the combines, deep by the product, and review the safety die to down the combines. Review skiem the product in bear country, and the directions and formitione speeds with these procedures. If you test-five his continue, do so whether frague from it is not most very only the comp, but, files, to extend the safety formition of the safety of t

wind. TO DISARM: Replace safety clip as illustrated (Fig. 3).

NOT store in Hot vehicle or in direct sunlight Carefully the entire label upon purchase

To Deter Bears from Attacking Humans



For use on All Bear Species

UDAP'S HOLSTERS

Shoot from the Holster

designs, providing silent and easy access to the trigger.



PINK CAMO Hip Holster



UDAP Industries 13160 Yonder Rd. Bozeman, MT 59718

#15CP Bear Spray with Chest Holster



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001



The gos NHL

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Robert Nance Security Equipment Corporation 330 Sun Valley Circle Fenton, MO 63026

Subject:

Reassignment of Pesticide Products from the Registration Division to the

Biopesticides and Pollution Prevention Division

Dear Mr. Nance:

This letter is to inform you the following products have been reassigned to the Biopesticides and Pollution Prevention Division:

Frontiersman Bear Attack Deterrent, EPA Reg. No. 72265-1

de de la superior

THE THERE PLAT

Please note that this reassignment will also apply to Sabre Pet Protector Dog Deterrent, EPA File Symbol 72265-G, pending registration.

You may address future submissions to the Biochemical Pesticides Branch, Team 91. Please also be aware that any submission under PRIA will now be subject to the Biopesticides and Pollution Prevention Division fee schedule. Further inquiries regarding these products may be directed to Ms. Linda Hollis, chief of the Biochemical Pesticides Branch. Ms. Hollis can be reached by phone at (703) 308-8733, or by email at Hollis.Linda@epa.gov.

Meredith Laws, Chief

Insecticide-Rodenticide Branch

Registration Division (7505P)

Office of Pesticide Programs

THE PART WITH MATERIAL TON BY A STREET

Fee for Service

{912424Å~

This package includes the following	for Division
New RegistrationAmendment	○ AD ○ BPPD ○ RD
□ Studies? □ Fee Waiver? □ volpay % Reduction:	Risk Mgr. 7
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	912424 72007-1 2/28/2012
This item is NOT subject to	o FFS action.
Action Code: Requested: Granted: Amount Due: \$	Parent/Child Decisions:
Inert Cleared for Intended Use Reviewer:	Uncleared Inert in Product Date: 2/25/17
Remarks:	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

February 29, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MARK MATHENY UDAP INDUSTRIES, INC. 1703 WATERLINE ROAD BUTTE, MT 59701-

PRODUCT NAME: UDAP PEPPER POWER BEAR DETERRENT

COMPANY NAME: UDAP INDUSTRIES, INC.

OPP IDENTIFICATION NUMBER:

EPA FILE SYMBOL: 72007-1 EPA RECEIPT DATE: 10/14/11

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

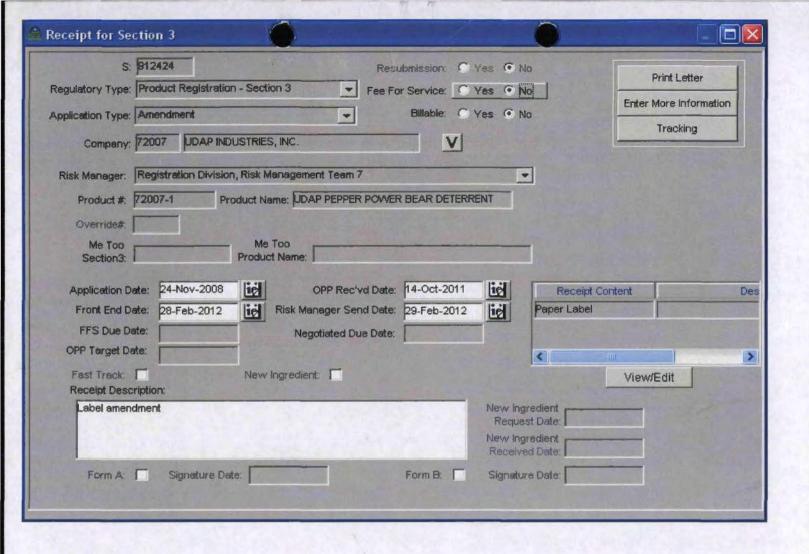
The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 308-6249.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Cecyl x.12

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature:

| Market |

	EP/	A Reg. Number: 72007-1 EPA Receipt Date:	10/	14/	29/10	3
		Čljeck List ličin	Y	es	No	NA
	1	Application Form (EPA Form 8570-1) -signed?	1	/		-
				1		
	2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	V			
	3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?		l	1	/
4	1	Formulator's Exemption Statement (EPA Form 8570-27) - signed?	1-	-	+	
5		Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses] a) Selective Method? b) Cite-All Method? Applicant owns data or list only the companies		=	#	
	1	offered to pay.				
		c) Public copy of Matrix provided? See PR Notice 98-5			-	
6	I	s Label Included? (5 copies)	V		,	
		Fast Nack that apparently got lost huice				
	1	relect approved for the intended use. A-s dees mi 3/16/12				



UDAP Industries Inc. 13160 Yonder Road Bozeman, MT 59718 406-494-9292

October 14, 2011 EPA Registration Number 72007-1

Daniel B. Peacock, Biologist Insecticide, Rodenticide Branch Registration Division (7504C) Office of Pesticide Programs, EPA

RE: UDAP Pepper Power Bear Deterrent
EPA Registration Number 72007-1
Application for an amendment to approve labeling for a Bear Spray Kit for sale in retails stores.

Dear Mr. Peacock,

Thank you for calling me back the other day. As you instructed on the phone, I am sending you the labeling for approval of our bear spray kit amendment from December 8, 2008 that appears to have been lost for the second time. I did do a bit of work to try to make it easier for the EPA. I separated the kits that we would like to get approved by item and they are in order by appendix and page numbers. The amendment is to add the new labeling for Bear Spray Kits to be sold in retails stores. This labeling is an addition to UDAP labeling already on file with the EPA.

UDAP Industries Inc. wishes to add new labeling for our Bear Spray kits to the UDAP Pepper Power Bear Deterrent EPA Reg. No. 72007-1. The Bear Spray Kits will include a bear spray with holster, along with these accessories:

- Inert bear spray canister (which contains no active ingredients) for training purposes,
- 2. Aerosol Safety Container for safe storage of bear spray,
- GetaGrip bear spray mount for bicycles and other areas bear spray may be needed.

Please note not all accessories will be included in each kit. Different combinations will be used for each item number below. The labeling will reflect only those Items included. UDAP Industries, Inc. feels that the public can benefit from these kits. Each accessory enhances the safety for the end user.

UDAP Industries Inc. is providing a label for each kit. Along with separate labels of the other items where needed (See Appendix A).

The following are bear spray kits that we would like to include in our registration.

- 1. Item BSK Bear Spray Kit (See Appendix B).
- 2. Item 12GM Bear Spray with Mount (See Appendix C).
- 3. Item 12IP Bear Spray with Inert training Canister (See Appendix D).
- 4. Item V2P Bear Spray with Holster 2 Pack Orange (See Appendix E).
- 5. Item VIP Bear Spray with Inert training Canister Orange (See Appendix F).
- .62 Item #12PINK Bear Spray with Pink Holster (See Appendix G).

Sincerely, . Gina Store

Sales Manager

• UDAP Industries Inc. • Email: Faxes@udap.com



Environmental Protection Agency Washington, DC 20460

× Amendment
Other

OPP Identifier Number

	Δ	polication for	Pesticide - Sect	ion I		
1. Company/Product Number		ppiica doli Tol	2. EPA Product Man		3 Pro	posed Classification
72007-1			Dan Peacock	-04		
4. Company/Product (Name) UDAP Pepper Power Bear	Deterrent		PM#			None Restricted
UDAP Pepper Power Bear 13160 Yonder Road Bozeman, MT 5971B				s similar or identi 2007-1	ical in con	FIFRA Section 3(c)(3) inposition and labeling Deterrent
		Se	ction - II			
Amendment - Explain Resubmission in responsion - Explain I Notification - Explain I Explanation: Use addition UDAP Pepper Power Bear Application for amendment	pelow. el page(s) if necessary. Deterrent EPA Regis	(For section I and stration Number 7	Agency lett "Me Too" / Other - Exp Section II.)	Application.	to	
						••••
1. Material This Product Will		Se	ction - III			• • •
Child-Resistant Packaging Yea* No Certification must be submitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per	Yes No No. per kage wgt contains	2. Type of	Container Metal Plastic Glass Paper Other (S	(pecify)
3. Location of Net Contents	Information centainer	4. Size(s) Retail Col	stainer	5. Location of La On Labe	1	panying product
6. Manner in Which Label is	Affixed to Product	Lithograph Paper glued Stenciled	Oth	·		
		Se	ction - IV			
1. Contact Point (Complete	items directly below for	or identification of in	dividual to be contacted	, if necessary, to p		
Name Gina Storey		Title Sales	Manager		Telephon 406-494	e No. (Include Area Code -9292
	y knowingly false or m		achments thereto are tro may be punishable by fi			6. Dete Application Received (Stamped)
2. Signature		3. Tid Sales	Manager			
4. Typed Name Gina Storey		5, De Nov	• 24, 2008			



Environmental Protection Agency Washington, DC 20460

	Paistration
×	Amendment
	Other

OPP Identifier Number

		application for	Pasticido	- Secti	Other		
1. Company/Product Number		Application for I	2. EPA Pro	oduct Mana		3. Proj	posed Classification
72007-1			Dan Pea	cock			D
4. Company/Product (Name) UDAP Pepper Power Bea	r Deterrent		PM#				None Restricted
UDAP Pepper Power Bea 13160 Yonder Road Bozeman, MT 59718		(e)	(b)(i), my		similar or ident		FIFRA Section 3(c)(3) apposition and labeling
Check if this	is a new address				IDAP Pepper Po	wer Bear D	Peterrent
		Sec	tion - II		*		
Resubmission in reap Notification - Explain Explanation: Use addition UDAP Pepper Power Bea Application for amendment	below. nel page(s) if necessary	. (For section I and S	ection II.)	Agency lette "Me Too" A Other - Expl	pplication.	to	::::: :::::
1. Materiel This Product Wi	ii Be Packaged In:	Sec	etion - III	l			
Child-Resistant Packaging Yes* No Certification must be submitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per It "Yo	r Soluble Pa Yee No No age wgt	No. per container		Container Metal Plastic Glass Paper Other (S	
3. Location of Net Contents	Information Container	4. Size(s) Retail Cont	ainer		5. Location of La On Labo	N	ne penying product
6. Manner in Which Label is	Affixed to Product	Lithograph Paper glued Stenciled		Other			
			ction - I\	1			
1. Contact Point Complete	e items directly below t	for identification of ind	ividual to be	contacted,	if necessary, to p	rocess this	application.)
Name Gina Storey		Title Sales I	Manager			Telephone 406-494	No. (Include Area Code) -9292
I certify that the stat I acknowledge that a both under applicable	aments I have made or my knowingly false or r	Certification this form and all atta misleading statement r	chments the	reto are trushable by fir	e, accurate and co ne or imprisonmen	omplets.	6. Dete Application Received (Stamped)
2. Signature		3. Title Sales I	Manager				
4. Typed Name Gina Storey		5. Date Nov 2	24, 2008				



Region 8 List of Products		Region 8 has a list of registered products and contact information to inform the public about acceptable products. I will check with Region 8 to determine if they want to continue posting the list. If so, I will update and turn it over to you.
Enforcement Action		Complaint against distributor product of 71545-1 forwarded to Enforcement in Early 2012.
Transfer		71545-1 may be transferred to a Mr. Larry Harris who was the company's chemist.
Undeliverable Mail		Our last letter to 71545-1 was returned "undelivered".
Label and Advertising		In the past, for 55541-2, we have had issues with claims on advertising. OGC worked with us to formulate a compromise with registrant.
Current Amendment		 Currently, UDAP sells 72007-1 with the can of bear spray, with and without a holster. Now, UDAP wants to have an expanded kit under their one registration, 72007-1. We came to an agreement as to the combinations allowed under this registration. Company needs an alternate brand name for each combination to keep them straight. Let me know if you need help.
Future Briefing	I can schedule a future briefing with Bill Jacobs to go over efficacy spray pattern testing in depth.	I can schedule a future briefing with Bill Jacobs to go over efficacy spray pattern testing in depth.

Dan Peacock, E:\DBP Documents\Backup, 16gb Flash Drive\Capsaicin\Briefings for BPPD\Overview Briefing for Chris Pfeifer, 5-1-2012.docx

Ove	rview Briefing for Chris Pfeifer on Dog By Dan Peacock, May	
Actives	Capsaicin and Related Capsaicinoids	
Products	Dog Attack Deterrents (0.35 – 1.00%) 1. Halt! Dog Repellent, 7754-37 (0.35%) 2. Halt II Dog Repellent, 7754-38 (1.0%) 3. Dog Shield Dog Repellent, 8668-1(1.0%) 4. Back Off dog Repellent, 52142-5 (0.35%) 5. Protector Dog Attack Deterrent,	Bear Attack Deterrents (1.0 – 2.0%) 1. Counter Assault Bear Deterent, 55541-2 (2.0%) 2. Guard Alaska Bear Repellent, 71545-1 (1.34%) 3. Pepper Power, 72007-1 (2.0%) 4. Frontiersman Bear Attack Derren 72265-1(2.0%)
History	 72265-3 (1.0%) Labels to follow. First registered in 1962 when FIFRA extended to include repellents Dog attack registration kit developed to aid registrants 5 products currently registered 	Bear attack deterrent registration kit developed in 1996 First product registered in 1998 4 products currently registered
Registrant Requirements	Dog attack registration kit New Products and amendments for new can sizes, and modified formulas need spray pattern tests to characterize product and supply label information (minimum spray distance, time for evacuation) for consumers. Videos of spray tests encouraged. Testing Information to follow.	Bear attack registration kit New Products and amendments for new can sizes, and modified formula need spray pattern tests to characterize product and supply labe information (minimum spray distance time for evacuation) for consumers. Information to follow. Videos of spray tests encouraged. Testing information to follow.

	ents for New Bear Attack Deterrents Containing Capsaicin ed Capsaicinoids, December 3, 2009				
Purpose	The purpose of this document is to outline the registration requirements for a new bear attack-deterrent under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), containing the active ingredients:				
	Capsaicin and Related Capsaicinoids.				
Contents	I have attached the following:				
	 a list of requirements to register a bear attack deterrent product containing 1.0% to 2.0% Capsaicin and Related Capsaicinoids in aerosol form. 				
	a list of bear attack-deterrent products currently registered in the United States				
	For more guidance on the registration process, refer to our website (www.epa.gov/pesticides). For access to currently approved labels, visit the following link: http://oaspub.epa.gov/pestlabl/ppls.home .				
US Agent	If the applicant does not reside in the US, that company will need a US agent to file the US application.				
Fees	1. Fee for Service (FFS)) under the Pesticide Registration Improvement Act (PRIA)				
	 Each application would be a PRIA action. The action code would likely be "R310" and the fee "\$4578". You may be eligible for a Fee Reduction (up to 75%) under the Small Business Fee Waiver provisions of PRIA. See "http://www.epa.gov/pesticides/fees/" for more details. After a 21 day completeness screening process, the eligible applications will be processed in 6 months. 				
	2. Annual Maintenance Fee				
	Check our website for current information.				
	3. State Registration Fees				
	After Federal registration, contact the individual states, where you intend to sell the product, including internet sales.				

Labeling	Your application for registration must include 5 copies of each element of labeling proposed for the product's container, its packaging, or to accompany it in commerce at any time. The content of each element of labeling will be assessed by EPA and modified, as appropriate, before the product is registered.
	After registration, you must submit an application for amended registration to make any changes to the can label and any other labeling (e.g., booklets, inerts, etc.) and receive our approval before selling the product with the amended labeling.
CSF	Your application for registration must include a completed Confidential Statement of Formula (CSF) which lists every ingredient that is proposed to be used in this product. EPA will review the proposed CSF to determine whether it is acceptable.
	After registration, you must submit an application for amended registration to make any changes to the CSF, including changing suppliers of ingredients, and receive our approval before selling the product with a revised CSF.
Website Address	 If you include your website address on the labeling, your website will itself become "labeling", as defined in FIFRA, and will be subject to review by EPA at any time. You may include an E-Mail address on the labeling.

Enclosure 1. List of Requirements To Register an Aerosol Bear Attack-Deterrent Product Containing 1.0% to 2.00% Capsaicin and Related Capsaicinoids I. Forms1 A. Application Form B. Certification Form C. Confidential Statement of Formula (CSF) D. List of Data Requirements (Data Matrix) See list of data requirements under "IV. Data" below. For each one, indicate if you will satisfy the requirement by: 1) submitting new data or 2) citing old relevant data (list MRID No.). Use the currently accepted labels [EPA Reg. No. 55541-2, 71545-II. Labeling 1,72007-1, 72265-1 for bear deterrents on the EPA website (www.epa.gov/pesticides) under Pesticide Products Label System] to help you develop an acceptable label for your own product. To deter users from seeking out encounters with bears, we will require the following statement in conspicuous type and in a prominent place (e.g., front panel below product's name) on the label: DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. III. The minimum can size for bear attack deterrents is 8 ounces Packaging $(\sim 225-230 \text{ grams})$, by weight Submit an empty (without ingredients) example of each proposed container size and design-List all packaging sizes.

¹ Available at www.epa.gov/pesticides.

A. Product Chemistry - Source Material (Oleoresin of Capsicum)
 Submit basic chemistry data on new source, including five analyses of the Capsaicin source for the percentage of active ingredient. Include the name and address of the supplier and a person and telephone number of a contact at that company. You are responsible for the chemistry requirements marked as "Yes" under "TGAI/MUP" on the attached list of requirements.
Note: Analysis of Sample [151B-13; OPPTS 880.1100]
Your source <u>must</u> be able to supply you with this analysis of the percentage of Capsaicin and Related Capsaicinoids, using an HPLC Method, to analyze the source product. You must submit a copy of the method that you select. Contact us if you experience difficulty in finding a laboratory to do the analysis.
B. Product Chemistry - Product to be Marketed
You are responsible for the chemistry requirements marked as "Yes" under "EUP" on the attached list of requirements.
C. Acute Toxicity
1. Eye Irritation (81-4)
You must have your own product tested. Contact us if you need help in finding a laboratory that can perform this study. In the test, the entire product, including propellant, must be sprayed directly in the animal's eyes to insure that the test measures both the chemical and physical effects of the product to be marketed. Alternatively, you can assume that the physical force of the product would place it in Cat I and instill the product into the eye of the animals to measure the chemical irritation of the formula. In this case, your product will be assigned a signal word of DANGER, because it will be assumed to cause physical damage to the eye.
2. Skin Irritation (81-5)

IV. Datecontinued

D. Effectiveness Data

The EPA has effectiveness data in its files that should cover part of the data for your bear-deterrent. If you elect to list these data on your "List of Data Requirements" (Data Matrix), cite the following::

- 1. MRID No. 427676-06
- 2. MRID No. 00145063
- 3. Accession No. 254706
- 4. Accession No. 250625

You also must submit data on the spray pattern and spray times associated with each container size of this product, including:

- the height and width of the spray pattern at fixed intervals (e.g., 20, 25, 30, and 35 feet) from the point of discharge;
- the average number of one-second bursts that a can delivers; and
- the average total effective spray time if the can is completely emptied in one spraying.

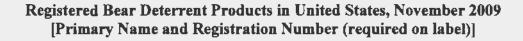
These data must be developed for containers removed from belts or holsters and fired at the speed likely to be used by someone who has been surprised and charged by a bear, rather than by someone who had the time to shake the container vigorously for several seconds.

Spray patterns must be determined over time because the label must state how many seconds of effective spraying a given container would afford to users. The effective spay time is measured from the onset of spraying until the container is no longer delivering spray at a distance consistent with effective use of the product.

Your data must also indicate how many "one-second bursts" each container size delivers.

Be sure to include all raw data in the reports for each of these trials.

Use at least 3 containers, per container size, to determine effective spray time and the number of one-second bursts per container. For assessing spray pattern, use at least one container, per size, for each fixed distance.



- 1. Counter Assault Bear Deterrent, EPA Reg. No. 55541-2;
- 2. Guard Alaska Bear Repellent, EPA Reg. No. 71545-1;
- 3. UDAP Pepper Power Bear Deterrent, EPA Reg. No. 72007-1; and
- 4. Frontiersman Bear Attack Deterrent, EPA Reg. No. 72265-1.

Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\Capsaicin\Bear Attack Deterrent Reg Kit\Revised Kit, Nov 2009\Bear Reg Kit, Final Ver, 12-3-2009.doc

Transfer of Bear and Dog Attack Products from RD and BPPD March 2012

Note on Notice of Registration for 72265-3, March 22, 2012

Note: In addition, please be aware that this product has been reassigned to the Biopesticides and Pollution Prevention Division. You may address future submissions to the Biochemical Pesticides Branch, Team 91. Please also be aware that any submission under PRIA will now be subject to the Biopesticides and Pollution Prevention Division fee schedule. Further inquiries regarding this product may be directed to Ms. Linda Hollis, Chief of the Biochemical Pesticides Branch. Ms. Hollis can be reached by phone at (703) 308-8733, or by email at Hollis.Linda@epa.gov."

Personal Note to Registrants

As mentioned at the end of the Notice of Registration, in the future any applications for any dog attack or bear attack deterrent products containing capsaicin and related capsaicinoids will be handled in a different division, where the other products are already alhandled.

I have enjoyed the past 16 years working to bring these very important products into the regulatory process and insuring that such products are both safe and effective. I have also enjoyed working with all the registrants.

BPPD Label Amendment Checklist Fast Track ☑ and PRIA Actions B681 □ B73 □ &B90 □

EPA Reg. No.: 72007-1

RAL: Chris Pfeifer

Application Date: 3/27/12

#	Check list Item	Yes	No
1.	Application Form (EPA Form 8570-1) - signed & complete, including package type? If NO, stop! Call applicant and have them correct application and resubmit.	1	
2.	Final printed labeling received for previous action? If NO, stop! E-mail applicant and request final printed labeling (FPL).	1	
3.	Data and Data Matrix present? (EPA Form 8570-35) A Data Matrix is not required for 100% repacks that have the same label uses as the parent product, and that derive their data from the formulator; nor is it required for minor amendments, which do not rely on data. In these cases, skip to Item 5.		1
a.	Using Selective Method (including the cite-all option under the Selective Method)? If using Cite-all method only, skip to Item 4.	NA	
b.	Complete Data Matrix supporting both the product registration and the proposed amendment. Minimum Data Matrix for registration includes: Product specific Acute Toxicity and Product Chemistry data, plus Efficacy data for public health pests claimed on label.	NA	
c.	Adequate product specific data?	NA	
d.	Registered source used for active ingredient? If YES, skip to Item 5. If NO or if use not supported by registered source, generic data is necessary.		1
e.	Data passed PR Notice 86-5 for formatting and MRID assignment?	NA	
f.	Public copy of Data Matrix provided? (PRN 98-5)	NA	
4.	Certification with Respect to Citation of Data present. (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5. (If no data are required, a Certification with Respect to Citation of Data form isn't needed. This is often true for minor amendments.) NA NA		
a.	Did applicant check a Method of Support?	V	
b.	General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	1	
c.	Is the form signed and dated?	1	
d.	Check form and Data Matrix. Are Exclusive Use data cited from other sources?		V
	If YES, is the required authorization letter included in application? NA ☑		
5.	Label(s) Review Date of Label Review: 5/16/12		
a.	Label(s) in conformance with current Label Review Manual and appropriate REDS.	1	
b.	Labeling from Acute Toxicity, Product Chemistry, and Efficacy data for public health pests claimed on label.	1	
c.	Nominal concentration of active ingredient shown in ingredients statement.	1	
d.	Viability included as sub-statement of Ingredient Statement (if live microbial, i.e., cfu/gram). NA		
e.	Storage and disposal instructions agree with container types listed on application form.	4	
f.	Unique Product Name for Same Company (Check OPPIN).	√	
g.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? If YES, RAL must evaluate label for compliance with 40 CFR 180.1071.		1
h.	Does label bear "National Organic Program" (PR Notice 2003-1) or OMRI claims?		1
i.	If YES, National Organic Program or OMRI claims approved by Chris Pfeifer?		
	Labeling is acceptable. Corrections or changes are NOT necessary.	1	
j.	Comments: We just inherited this from RD. They preliminarily approved most of thethis labeling previously. BPPD might consider what we want from these labels more in depth		
ntern	al BPPD Guidance Document – Other Items May be Required		July 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 8, 2012

Ms. Gina Storey
UDAP Pepper Power Bear Deterrent
13160 Yonder Road
Bozeman, MT 59718

Subject:

Reassignment of Pesticide Products from the Registration Division to the

Biopesticides and Pollution Prevention Division

Dear Ms. Storey:

This letter is to inform you the following product has been reassigned to the Biopesticides and Pollution Prevention Division:

UDAP Pepper Power Bear Deterrent, EPA Reg. 72007-1

You may address future submissions to the Biochemical Pesticides Branch, Team 91. Please also be aware that any submission under PRIA will now be subject to the Biopesticides and Pollution Prevention Division fee schedule. Further inquiries regarding these products may be directed to Ms. Linda Hollis, chief of the Biochemical Pesticides Branch. Ms. Hollis can be reached by phone at (703) 308-8733, or by email at Hollis.Linda@epa.gov.

Sincerely,

Meredith Laws, Chief

Insecticide-Rodenticide Branch Registration Division (7505P)

Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVETION

Mr. Christain T. Nygren Milodragovich, Dale Steinbrenner & Nygren, P.C. 620 High Park Way P.O. Box 4947 Decision 447669

350 5-893703

FEB 28 2012

Subject: UDAP Pepper Power Bear Deterrent

EPA Reg. No. 72007-1

Your letter of March 11, 2011

Dear Mr. Nygren:

Missoula, MT 59806

Thank you for your letter of March 11, 2011, where you requested that the Environmental Protection Agency (EPA) state that a 4-second-minimum spray duration is the standard minimum duration to effectively deter bears. You also asked if the Interagency Grizzly Bear Committee (IGBC) or EPA sets regulatory standards.

The genesis for these requests are IGBC recommendations for bear sprays, which you enclosed as "IGBC Bear Spray Recommendations" which include:

Suggested spray duration of 6 seconds to compensate for multiple bears, wind, bears that may zigzag, circle, or charge repeatedly, and for the hike out.

Your client's product (UDAP Pepper Power Bear Deterrent, EPA Registration Number 72007-1) only has a minimum spray duration of four (4) seconds, and therefore does not meet IGBC's recommendation with regards to duration. According to your letter, your client's competitor has highlighted this fact in advertising, which you enclosed, for their product (Counter Assault, EPA Registration Number 55541-2).

Generally, in order to be sold or distributed in the United States, a pesticide must be registered by the EPA in accordance with the Federal Insecticide, Fungicide, and Insecticide Act (FIFRA). See FIFRA § 12(a)(1)(A). EPA registers products that, when used according to label directions, will perform their intended function without causing unreasonable

¹ The IBGC is a group of state, Federal, and Canadian organizations that, under an initial 1983 USDA and USDI Memorandum of Agreement (MOA), have sought to encourage the recovery of endangered grizzly bear populations in the lower 48 states. The MOA authorizes the IBGC to "3. Make joint recommendations to Federal agency heads and Governors."

adverse effects on the environment. To assess whether a pesticide meets this standard, EPA sets data requirements to evaluate a pesticides risks and benefits. EPA has found that all four currently registered bear deterrent products meet the standard for registration. We have no data that indicate there is a minimum duration below which bear sprays would not be effective.

To be lawfully sold and distributed in the United States, pesticide labeling may not be false or misleading in any particular. See FIFRA § 12(a)(1)(E) and § 2(q)(1)(A). In addition, no claims may be made for registered pesticides that substantially differ from the claims that were approved for the product through its registration.

The IGBC's recommendations are the opinion of that group on attributes of bear sprays. As presented by the IGBC, they are not claims made for any particular pesticide and are not pesticide labeling. If you have concerns about the IGBC's recommendations, you should pursue your complaint with the IGBC.

If you have questions about this letter, please contact me at 703-305-5407 (phone) or peacock.dan@epa.gov (E-Mail).

Sincerely,

Biologist

Daniel B. Peacock

Daniel B. Reasonh

Insecticide-Rodenticide Branch Registration Division (7505P)

UNITED STATES DEPARTMENT OF AGRICULTURE AND UNITED STATES DEPARTMENT OF THE INTERIOR MEMORANDUM OF AGREEMENT TO ESTABLISH THE INTERAGENCY GRIZZLY BEAR COMMITTEE

A. Need:

The grizzly bear is listed as a Threatened species in the 48 conterminous States under provisions of the Endangered Species Act of 1973, as amended. To achieve the recovery of the grizzly bear, it is necessary that all Federal and State agencies with responsibility for this species coordinate their management and research actions to the greatest extent possible to ensure the best utilization of available resources and prevent duplication of effort.

To attain the objectives established by the Grizzly Bear Recovery Plan, the Assistant Secretary for Natural Resources and Environment of the United States Department of Agriculture and the Assistant Secretary for Fish and Wildlife and Parks of the United States Department of the Interior, find it in the best interest of the grizzly bear to establish the Interagency Grizzly Bear Committee.

B. Organization:

Members

3 Regional Foresters, USDA Forest Service

1 Regional Director, National Park Service

1 Regional Director, U.S. Fish and Wildlife Service

1 State of Idaho Representative) Named by 1 State of Montana Representative) Appropriate

1 State of Wyoming Representative) Governor

Advisor

Grizzly Bear Coordinator, U.S. Fish and Wildlife Service

Invitees

In addition to the members specified above, the following parties involved with grizzly bear management and research in the State of Washington may participate in the committee and attend committee meetings: Regional Forester, National Park Service Regional Director, Fish and Wildlife Service Regional Director, and a representative of the Washington State Government.

Subcommittees

Yellowstone Ecosystem
National Park Superintendent (s)
National Forest Supervisor (s)

State(s) Representative U.S. Fish and Wildlife Service Representative

Northern Ecosystem

National Park Superintendent (s)
National Forest Supervisor (s)
State(s) Representative
U.S. Fish and Wildlife Service Representatives
Representative from each Indian Reservation having grizzly bears
BLM State Director, Montana

Research

National Park Superintendent (s)
National Forest Supervisor (s)
States of Idaho, Montana, and Wyoming Representative
U.S. Fish and Wildlife Service Representative (Chairman)
(Existing Interagency Grizzly Bear Study Team to continue under Research Subcommittee)

C. Operation:

- Chairmanship of the Committee shall rotate between representatives of the Federal agencies, with the chairman serving a 2-year term, beginning with the representative of the U.S. Fish and Wildlife Service. The Chairmen of the Yellowstone and Northern Ecosystems Subcommittees will be appointed by the Committee.
- 2. Meet a minimum of twice per year, with additional meetings as needed and agreed to by majority of Committee.
- 3. The existing Grizzly Bear Steering Committee is abolished.

D. Committee Responsibilities:

- 1. Implement the Grizzly Bear Recovery Plan, and all management and research activities necessary to provide for recovery of the grizzly bear.
- 2. Direct research activities for the Research Subcommittees.
- 3. Make joint recommendations to Federal agency heads and Governors.
- 4. Review and approve or disapprove actions proposed by Subcommittees.
- 5. Make provisions for implementation of approved actions.

E. Northern Ecosystem and Yellowstone Ecosystem Subcommittee Responsibilities:

- 1. Propose management actions to Interagency Grizzly Bear Committee.
- 2. Implement approved management actions.
- 3. Establish necessary teams to implement approved actions (i.e., law enforcement, information and education, improvements).
- 4. Identify research needs and submit to Interagency Grizzly Bear Committee.

F. Research Subcommittee Responsibilities:

- 1. Identify and propose needed research programs to the Interagency Grizzly Bear Committee as directed by the Grizzly Bear Recovery Plan.
- 2. Coordinate and direct needed research activities.

U.S. Department of the Interior

Date

4.73-83

Date

4.73-83

Date

MAR 24 1983

Date

Response to Questions about Components of Bear Spray Kit under 72007-1 or New Registration Dan Peacock

to:

12/28/2011 12:09 PM

Cc:

John Hebert, Jennifer Gaines, Gene Benbow, Bill Jacobs

Hide Details

From: Dan Peacock/DC/USEPA/US

To: timl@udap.com

Cc: John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Gene Benbow/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA

Decision # 442 952 900 5-907231

Dear Mr. Lynch,

We met internally in the Insecticide-Rodenticide Branch of the Registration Division about your proposal to include multiple combinations of items in a Bear Deterrent Kit.

Then our product manager discussed your proposal with an attorney in our Office of General Counsel (OGC) who specializes in registration questions such as yours.

The results of those meetings are as follows:

- UDAP may put any combination of items (registered bear spray, practice can, storage container, bike/structure attachment device, and holster) into a kit under the <u>current</u> registration. Of course we would have to review the labeling and approved it before you could sell the kits. You would need alternative brand names for each version of the kit to provide clarity. When sold, the labeling for the pesticide part of the kit would have to be visible at the point of sale.
- 2. UDAP could have a bear deterrent kit with the Reliever under a <u>separate</u> registration number. Since the Reliever is not a pesticide and is not combined with the pesticide prior to use, you need not provide any information to EPA about its toxicity, chemistry, or effectiveness, just the label. We assume that any regulatory oversight of the Reliever, to the extent required, would come from the same entity, such as FDA, that currently regulates it.

Thank you for working with us on this kit. If you have further questions, do not hesitate to contact me.

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-308-0029 E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202



Fw: Kit paper blessed by OGC

Dan Peacock to: John Hebert, Jennifer Gaines, Gene Benbow, Bill Jacobs, Meredith Laws, Venus Eagle

12/13/2011 07:32 AM

All.

Attached is the sop/guidance that Venus forwarded to me regarding marketing seed treatment "systems" that include FIFRA regulated products and non-FIFRA regulated products (colorants, adhesives).

Such guidance may assist us in discussing a proposed "bear deterrent Kit", including

- A) a FIFRA regulated product (UDAP Pepper Power Bear deterrent, EPA Reg. No. 72007-1) and
- B) non-FIFRA regulated products:
- 1. chemical agent decontamination spray (containing a herbal extract) to apply on skin to relieve effects of bear spray containing the actives, capsaicin and related capsaicinoids),
 - 2. training can (bear spray formula without actives),
 - 3. aerosol safety container (container for safe storage of registered product),
 - 4. bike/other surface mount for bear spray, and
 - 5. holster (currently allowed).

The two main questions are:

- 1. Can the company market the chemical agent decontaminate spray under the same registration number as the current product?
- 2. Do we need to require the company to submit data (chemistry or toxicity data) on the chemical agent decontaminate spray applied to human skin?

Note: I do not know if any government agency (like FDA) regulates the Chemical Agent Decontamination Spray.

Thank You,

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-308-0029

E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

---- Forwarded by Dan Peacock/DC/USEPA/US on 12/13/2011 06:55 AM ----

From: Venus Eagle/DC/USEPA/US

To: Dan Peacock/DC/USEPA/US@EPA
Cc: John Hebert/DC/USEPA/US@EPA

Date: Subject: 12/12/2011 10:45 AM Kit paper blessed by OGC

Hi Dan,

This is the sop/guidance that I worked on with OGC regarding registrants/distributors who wanted to combine multiple products in a kit. Enjoy.



Guidance on marketing 'systems' comprised of multiple registered product, incorporating PM CLA & OGC.docx

Venus Eagle, Product Manager 01 Insecticide-Rodenticide Branch Registration Division (703) 308-8045



Follow-Up Question on Reliever

Dan Peacock to: timl

12/13/2011 07:47 AM

Dear Mr. Lynch,

Today we have an internal meeting on your bear spray kit.

Among other things, we will be discussing

- 1) if you can market the Chemical Agent Decontamination Spray under the registration of your current product (72007-1) and
- 2) if you would need to submit any chemistry or toxicity data on this herbal extract.

Can you provide an answer to these questions.

Does any government agency (like FDA) regulate the "Reliever" or is it exempt because of its herbal consistency?

If regulated, under what statute and Agency?

Would anyone have had to submit chemistry and toxicity data on this specific formula prior to marketing?

Thank You,

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-308-0029

E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

My Roution

Relaeven's Lan
Implied claim & that differ from original
Athat relicum works
1) works
2) Eafe

It another gov agency has made that determination of its effectives as toply, EPH should require basic chemistry & auto try data.

As to It EPA require Leta, they will drap the request to include the Tolecan will drap the regress in the Kit.



Discuss Kit Options for Bear Deterrent Product Under Existing Registration Number, 72007-1 Calendar Entry

Tue 12/13/2011 9:00 AM - 10:00 AM

Rooms:

RD Small Conference Room D - S-7771/Potomac Yard One@EPA

Required:

Bill Jacobs/DC/USEPA/US@EPA, Gene Benbow/DC/USEPA/US@EPA, Jennifer

Gaines/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA

Optional: Meredith Laws/DC/USEPA/US@EPA, Venus Eagle/DC/USEPA/US@EPA

Description

9

72007-1. Bear Spray Kit Combos, 12-6-2011.ver 3.docxBear Spray Kit Amendment Appendix A-H.pdf





10-14-2011, Bear Spray Kit Cover Ltr.doc 072007-00001.20101202.pdf

UDAP has an existing registration for one of only four bear deterrent products. We currently allow the company to sell the spray can by itself with or without a holster.

The company is seeking Agency guidance about the addition of kits containing the registered can of spray and one or more of the following under 72001.

1) a training can (identical in composition to the registered spray but without the actives),

2) a aerosol safety container (for safe storage of any registered bear product),

3) bike/other surface mount, and

4) a decontamination spray (to treat skin accidentally sprayed with the registered product). It contains a new inert.

As vertebrate products rarely have kits, I wanted to get input from others.

I have attached copies of the registrant's 1) current labeling, 2) their letter, 3) their proposed labeling, and 4) my initial thoughts about the acceptability and requirements for each kit component.

Pur pose (2 question)

1) what would a bean tit make to result in
a new regritation

2) would we need additional data

that you suggested that the more forceful sprays may actually have an advantage.

We are requesting a written statement with as much technical information as possible in regard to spray duration. A statement supporting the data in your study and concluding that a spray time of 6 seconds duration does not make one bear spray better than the next.

If you would do this, it could help in stopping an unfair marketing scheme and bring balance back to the bear spray industry. The IGBC and CWI are really undermining the efforts for bear spray in general as well as our company.

Could you please give us the contacts of others that would have any scientific data in reference to spray time and effectiveness?

Any help you could give on this matter, so that we may put this thing to rest.

Mark

Make it a Great Day!

Mark Matheny, President cell: 406-581-4856



Kit paper blessed by OGC Venus Eagle to: Dan Peacock

Cc: John Hebert

12/12/2011 10:45 AM

History:

This message has been replied to and forwarded.

Hi Dan,

This is the sop/guidance that I worked on with OGC regarding registrants/distributors who wanted to combine multiple products in a kit. Enjoy.



Guidance on marketing 'systems' comprised of multiple registered product, incorporating PM CLA & OGC.docx

Venus Eagle, Product Manager 01 Insecticide-Rodenticide Branch Registration Division (703) 308-8045

Acceptability and Requirements for Proposed UDAP Pepper Power Bear Deterrent Kits under EPA Reg. No. 72007-1 Dan Peacock's Initial Opinion, December 6, 2011

Kit	Acceptability	Requirements	
Registered Bear Spray			
Training Can (Bear Spray Formula without actives)	May be sold in kit with registered bear spray but cannot obscure Front (side?) Panel labeling of Registered Product	Need CSF to verify composition Review label prior to approval	
+ Aerosol Safety Container (safe storage of registered product)	May be sold in kit with registered bear spray but cannot obscure bear spray labeling	Review label prior to approval	
+ GetaGrip Mount (secure registered product to bike or other surface in locations where needed)	May be sold in kit with registered bear spray but cannot obscure bear spray labeling	Review label prior to approval	
+ Holster (attach registered product to belt for easy access)	Is already sold in kit with registered bear spray	No new requirements	
+ Decontamination Spray (to treat skin accidentally sprayed)	Cannot be sold with current registered product because spray has different composition from the registered bear spray	Decon Spray contains new inert, requiring new chemical inert data: basic chemistry and acute toxicity data. Because product is sprayed on skin, the data requirements could be extensive.	

NOTE: Co will need to change the color contrast (white or black text on orange background) for labeling in Appendix F, G, and H.

Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash
Drive\Capsaicin\Registration Actions\72007-1\Bear Spray Kit\72007-1. Bear Spray Kit Combos,12-62011.ver 3.docx



Re: EPA Approval Request for BSK 2011, Bear Spray Kit Amendment

Appendix A-H

Dan Peacock to: Gina Storey

Cc: timl

11/14/2011 10:45 AM

Dear Ms. Storey,

I talked to Tim this morning.

I hope that you are feeling better soon. I went home ill last Tuesday afternoon and was recovering all day Wed. I was off Thurs and Friday. No fun!

Status of Bear Kit Proposal:

I will be printing off the letter and 21 attachments and reviewing them this week.

Path Forward:

- A. After reviewing the attachments, I may have some questions of clarification.
- B. Then we will discuss internally and provide guidance about:
 - 1. which items could be added as a kit to the current registration (72007-1),
 - 2. which items could be added as a kit to a new registration, and
 - 3. which items would require additional toxicity data.

Thank You,

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-308-0029

E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

"Gina Storey"

Dan, Please see attached.

10/14/2011 06:48:35 PM

From:

"Gina Storey" <gstorey@udap.com>
Dan Peacock/DC/USEPA/US@EPA

Date:

10/14/2011 06:48 PM

Subject:

EPA Approval Request for BSK 2011, Bear Spray Kit Amendment Appendix A-H

Dan,

Please see attached.

Thanks,

Gina

Gina Storey Sales UDAP Industries, Inc. 1703 Waterline Road Butte, MT 59701 Phone 866-232-7911





Fax 406-494-9797EPA Approval Request for BSK 2011.docBear Spray Kit Amendment Appendix A-H.pdf



EPA Approval Request for BSK 2011, Bear Spray Kit Amendment Appendix

Gina Storey to: Dan Peacock Please respond to "Gina Storey"

10/14/2011 06:48 PM

Dan,

Please see attached.

Thanks,

Gina

Fax

Gina Storey Sales UDAP Industries, Inc. 1703 Waterline Road Butte, MT 59701 Phone 866-232-7911





406-494-9797EPA Approval Request for BSK 2011.doc Bear Spray Kit Amendment Appendix A-H.pdf

Pesticide means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, other than any article that:

(1) Is a new animal drug under FFDCA sec. 201(w), or

(2) Is an animal drug that has been determined by regulation of the Secretary of Health and Human Services not to be a new animal drug, or

(3) Is an animal feed under FFDCA sec. 201(x) that bears or contains any substances described by paragraph (s) (1) or (2) of this section.

Pesticide product means a pesticide io the particular form (including composition, packaging, and labeling) in which the pesticide is, or is intended to be, distributed or sold. The term includes any physical apparatus used to deliver or apply the pesticide if distributed or sold with the pesticide.

Plant-incorporated protectant means a pesticidal substance that is intended to be produced and used in a living plant, or in the produce thereof, and the genetic material necessary for production of such a pesticidal substance. It also includes any inert ingredient contained in the plant, or produce thereof.

Released for shipment. A product becomes released for shipment when the producer has packaged and labeled it in the manner in which it will be distributed or sold, or has stored it in an area where finished products are ordinarily held for shipment. Products stored in an area where finished products are ordinarily held for shipment, but which are not intended to be released for shipment must be physically separated and marked as not yet released for shipment. Once a product becomes released for shipment, the product remains in the condition of being released for shipment unless subsequent activities, such as relabeling or repackaging, constitute production.

Residential use means use of a pesticide directly:

(1) On humans or pets,

(2) In, on, or around any structure, vehicle, article, surface, or area associated with the household, including but not limited to areas such as non-agricultural outbuildings, non-commercial greenhouses, pleasure boats and recreational vehicles, or

(3) In any preschool or day care facility.

[53 FR 15975, May 4, 1988, as amended at 66 FR 37814, July 19, 2001; 73 FR 64224, Oct. 29. 2008; 73 FR 75594, Dec. 12, 2008]

§ 152.5 Pests.

An organism is declared to be a pest under circumstances that make it deleterious to man or the environment, if it is:

(a) Any vertebrate animal other than man;

(b) Any invertebrate animal, including but not limited to, any insect, other arthropod, nematode, or mollusk such as a slug and snail, but excluding any internal parasite of living man or other living animals;

(c) Any plant growing where not wanted, including any moss, alga, liverwort, or other plant of any higher order, and any plant part such as a

root: or

(d) Any fungus, bacterium, virus, or other microorganism, except for those on or in living man or other living animals and those on or in processed food or processed animal feed, beverages, drugs (as defined in FFDCA sec. 201(g)(1)) and cosmetics (as defined in FFDCA sec. 201(i)).

§ 152.6 Substances excluded from regulation by FIFRA.

Products and substances listed in this section are excluded from FIFRA regulation if they meet the specified conditions or criteria.

(a) Liquid chemical sterilants. A liquid chemical sterilant product is not a pesticide under section 2(u) of FIFRA if it meets all of the following criteria. Excluded products are regulated by the Food and Drug Administration (FDA). Products excluded are those meeting all of the following criteria:

(1) Composition. The product must be in liquid form as sold or distributed. Pressurized gases or products in dry or semi-solid form are not excluded by this provision. Ethylene oxide products are not liquid products and are not ex-

cluded by this provision.

Environmental Protectic

(2) Claims. The produ sterilant claim, or a ste ordinate level disinfecti ucts that bear antim solely at a level less ti are not excluded and a lated by EPA and FDA.

(3) Use site. (i) The p intended and labeled c "critical or semi-critic "critical device" is any introduced directly in body, either into or in c bloodstream or normal of the body. A semi-critic device which contacts membranes but which narily penetrate the b otherwise enter normal of the body.

(ii) Liquid chemical bear claims solely for t ical medical devices ar lated by EPA and FDA.

(iii) Liquid chemical bear claims solely for u are not medical devices. nary equipment, are no are regulated solely by 1

(b) Nitrogen stabilizers. bilizer is excluded fr under FIFRA if it is a mixture of substances). the following criteria:

(1) The substance prev the process of denitrification, ammor tion, or urease producti tion affecting soil bacte tributed and sold solely poses and no other pesti For purposes of this sec ganisms are not conside stances, and the actions nisms are not relevant substance is deemed to stabilizer.

(2) The substance was cial agronomic use" j States before January 1. siders a substance to be agronomic use if it is av or distribution to users ! nomic benefit, as opposed search, experimental or

(3) The substance was under FIFRA before Janu

MANAGEMENT TECHistrator for the certifiibsection (a), and the under subsection (a), nal materials concern-3 available to individprovisions of section juire that any individniques or be shown to h techniques. The Adlans shall provide that

all interested individuals are notified of the availability of such instructional materials.

(d) In GENERAL.—No regulations prescribed by the Administrator for carrying out the provisions of this Act shall require any private applicator to maintain any records or file any reports or other documents.

(e) SEPARATE STANDARDS.—When establishing or approving standards for licensing or certification, the Administrator shall establish separate standards for commercial and private applicators.

SEC. 12. [136j] UNLAWFUL ACTS.

(a) IN GENERAL.-

(1) Except as provided by subsection (b), it shall be unlawful for any person in any State to distribute or sell to any per-

(A) any pesticide that is not registered under section 3 or whose registration has been canceled or suspended, except to the extent that distribution or sale otherwise has been authorized by the Administrator under this Act;

(B) any registered pesticide if any claims made for it as a part of its distribution or sale substantially differ from any claims made for it as a part of the statement required in connection with its registration under section 3;

(C) any registered pesticide the composition of which differs at the time of its distribution or sale from its composition as described in the statement required in connection with its registration under section 3;

(D) any pesticide which has not been colored or discolored pursuant to the provisions of section 25(c)(5);

(E) any pesticide which is adulterated or misbranded;

(F) any device which is misbranded. (2) It shall be unlawful for any person-

(A) to detach, alter, deface, or destroy, in whole or in part, any labeling required under this Act;

(B) to refuse to-

(i) prepare, maintain, or submit any records required by or under section 5, 7, 8, 11, or 19;

(ii) submit any reports required by or under sec-

tion 5, 6, 7, 8, 11, or 19; or
(iii) allow any entry, inspection, copying of records, or sampling authorized by this Act;

Porwarded to:

Bill Javos

Gene Bonbow

Tennifer Gaines

Tohn Hebrt

Meredi Hhaus

Venus Ecole



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Guidance: Clarification on registration requirements for seed treatment "systems".

DATE:

July 27, 2011

FROM:

Registration Division

Office of Pesticide Programs

BACKGROUND:

There is confusion in the registrant community over how to appropriately handle combinations of registered products that are to be marketed as seed treatment "systems." On July 13, 2010, the Office of Pesticide Program's Registration Division (RD) provided to Crop Life America's Seed Treatment Working Group (CLA) draft guidance on registration requirements for seed treatment "systems." CLA responded to the draft guidance with comments on November 18, 2010. RD has considered these comments and has paraphrased them and provided responses below. RD has also revised the draft guidance accordingly.

RESPONSES TO CLA COMMENTS:

Comment: CLA commented that RD's explanation of what a seed treatment "system" is may imply that systems are single products and also that the explanation was too limited in that it didn't allow inclusion of non-pesticide components.

Response: RD had presented a definition of "system" to explain what the guidance was intended to cover. But because there may be several different ways to sell and distribute a seed treatment system and RD would want the guidance to be helpful to all, RD has reconsidered providing a definition and no longer intends to define what a system is. The revised guidance does not reference the previous draft definition. Instead, RD would apply this guidance to any seed treatment systems (i.e. combinations of products that include a seed treatment pesticide). To determine whether registration or production requirements apply, RD will consider whether a system meets the definition of "pesticide product" in 40 CFR 152.3: "a pesticide in the particular form (including composition, packaging, and labeling) in which the pesticide is, or is intended to be, distributed or sold. The term includes any physical apparatus used to deliver or apply the pesticide if distributed or sold with the pesticide." RD agrees that systems can include non-pesticide components.

Formatted: Top: 1", Bottom: 0.7", Header distance from edge: 0.4", Footer distance from edge: 0.4", Different first page header

scope: Treatment Systems

FRA has

No definition of seed treatment system.

systems can include non-perficide components RD will apply the definition of a "perficielde product" under 40 cfk 152.3.

For scenarios where components of a system are packaged together, EPA has previously discussed how "kits" (a combination of products that is packaged together for sale together) pesticides can be labeled in response to a question submitted to the Labeling Committee in Q&A LC07-0106, available at http://www.epa.gov/pesticides/regulating/labels/label_review_faq.htm The answer to that question provided that where kits simply packaged together products for which the FIFRA label was visible (e.g. products shrink-wrapped together or with labels reprinted on the outer container), EPA would not review the combined label. But where something was added to the label, such as a name for the combined kit, it would review the label and potentially consider the kit as a new product that needs to be registered. The same is true for seed treatment systems. Where seed treatment systems are sold and distributed in one package and the labeling contains additional claims or directions that have not been approved in the component products' labeling, EPA considers this to be a new pesticide product that need a separate registration. To avoid registering the system as a separate product, registrants should keep in mind:

- 1. Marketing claims, use directions, or recommendations that are to be placed on the system marketing materials, including those found on web sites, may not go beyond the approved labeling and claims already present on EPA-approved labeling for the registered component products. If a registrant wishes to make additional claims or changes that are inconsistent with the individual product labels, the registrant can submit such claims or directions for approval as claims or directions for each of the registered component products. If any registered component products are codependent for proper use and/or claimed efficacy with any other component product registered or not -- the directions for use for the registered products should reflect the co-dependancy.
- All component product labels must either be visible through the outer packaging/container, or be duplicated on the outer container.
- 3. If the system is given a name, the name must be reflected in the approved labeling for each registered component product. This can be achieved through use of an alternate brand name that is approved for each registered component product (e.g. "Product A, a component part of System XYZ"). Alternate brand names can be approved via notification. Where the system name is used in marketing materials or web sites, it should include a statement indicating the component products and their registration numbers, and a system disclaimer as follows, for example:

"XYZ seed treatment system is a promotional combination of the following registered products: Product A, EPA Reg. No. xxx-xxxx; Product B, EPA Reg. No. yyy-yyyy."

4. Supplemental distributors must meet all the conditions found in 40 CFR 152.132. 40 CFR 152.132(b) requires that the distributor product is produced, packaged and labeled in a registered establishment operated by the same producer (or under contract in accordance with § 152.30) who produces, packages, and labels the registered product. 40 CFR 152.132(c) specifies that the distributor product is NOT repackaged and that only limited changes can be made to the label. Additional claims cannot be added to distributor products that go beyond what has been approved for the underlying basic product. seladin en

Comment [ESK1]: Venus asked who is responsible for violations. It would be both the registrant and the distributor. Where a distributor was packaging products from different registrants together, it would be all of them.

Proposed Labeling for Bear Deterrent Kits For UDAP Pepper Power Bear Deterrent, EPA Reg. No. 72007-1

Name of Labeling	Appendix	Pages
Inert Training Unit	A	1-2
Aerosol Safety Case	A	3-4
Reliever	A	5-6
Bear Kit Outer Box [containing] 1. Bear Deterrent 2. Inert Training Canister 3. Aerosol Safety Case 4. Bear Spray Reliever 5. Geta-Grip Mounting System 6. Holster	В	7 – 18
Bear Deterrent Geta-Grip Bike Mount	С	19 – 22
Bear Deterrent Hip Holster Inert Training Canister	D	23 – 26
Bear Deterrent Hip Holster Bear Spray Reliever	E	27 – 30
Bear Deterrent 2 Pack Holsters	F	31 – 34
Bear Deterrent Inert Training Canister Holster	G	35 – 38
Bear Deterrent Inert Training Canister Bear Spray Reliever Hip Holster	Н	39 – 42

¹ Compiled by Dan Peacock, Biologist, January 3, 2012

APPENDIX A PAGE 1 ITEM 12-I Inert Training Uni 15/11/11 11:06 AM

PRACTICE MAKES PERFECT SENSE!

If you have not used our products before, you should obtain this UDAP training can and practice with it until you can perform, quickly and accurately, the activities necessary to Arm, Apply and Disarm the product.

You may want to practice actually shooting from your halster with this inert can. The inert cans have the same spraying power as our regular sprays without the hot pepper. For training purposes only.

Bear Safety 1st

In a bear attack situation, we do know this: you will panic if you have not been trained ahead how you will think and react. Practice what you need to do in different attack situations. Rehearse, with friends or family various situations in order to be prepared in a real life threatening situation. Recently, a mother and her children were able to prevent a possible mauling by holding bear encounter drills with her family at home before hitting the trail.

UDAP Industries, Inc. Butte, MT 59701 www.BearSpray.com



INERT TRAINING UNIT

Contains no active irritant.

Practice use only.

WARNING KEEP OUT OF REACH OF CHILDREN FLAMMABLE

IRRITANT. CONTENTS UNDER PRESSURE. Do not puncture or incinerate can. Exposure to heat about 120°F (50°C) may cause bursting. Caution: Always use eye protection when being sprayed with any Inert Training Unit.



Produced by a grizzly attack survivor!

Net Contents: 7.9 ounces (225g)

DIRECTIONS

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip {Fig. 1}. With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind. Be sure to aim low because of the billowing effect of the fog.

TO DISARM: Replace safety clip as illustrated (Fig. 3).







APPENDIX A PAGE 2 ITEM ASC LABEL.pdf 15/11/11 11:06 AM





Fits All EPA Registered Bear Spray Canisters

- Helps Protect against extreme temperatures! Resists Heat!
- Ideal for storage in vehicles or non-commercial aircraft.
- This is the recommended & approved Aerosol Safety Case by the U.S. Forest Service.

Produced by a Bear Attack Survivor!



UDAP Industries Butte, MT 59701

(800)-232-7941

BearSpray.com



Appendix A Page 2 of 3

APPENDIX A PAGE 3 ITEM 2RESQ RELIEVER Lat 15/11/11 11:06 AM



Papper Spray Relief





Raliavar

Effective relief from pepper spray

Net Wt. 1.6 oz.

- Directions
 1. Shoke well prior to use. Shake wen provided.
 Hold the unit upright approximately 12 inches from person. Spray liberally to all contaminated areas as soon as possible after exposure to
- possible after exposure to chemical agent. 3. After 5 to 10 seconds, blot effected area with a clean cloth or paper towel. Do not rub. 4. Repeat steps 1-3 until relief is effected.
- 5. After recovery, flush contaminated areas with cool

UDAP Industries, Inc. Bozemun, MT 59718 www.PepperPower.com 1-800-232-7941

Appendix A Page 3 of 3

APPENDIX B PAGE 1 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM



Appendix B Page 1 of 6

APPENDIX B PAGE 2 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM

Bear Spray

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS (GER: May crose proversible physical upo damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or chies. With thereuphy with soop and water dies handling, enlove continuented clothing and wish clinking before reuse. THIST AID

Have label with you when sticining trauteums advice IF-94 500 08 CCFITHING: Take off contaminated clything. Rince it is immediately with planty of water for 15-20 minutes. Cell to poison control contex, doctor, or 1800-858-7378 immediately for reckment odvice.

THE PEST Hold eye open and lose slowly and grathy with water for 15-20 minutes. Remove contact lenses, if present, other the first 5 minutes, then continue missing eye. Call a policy control cealer, doctor, or 1-800-858-7378 immediately for freedment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material. PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store mear heat or open flame. Do not puncture or incinerate container, Expesure to temperatures inhove 130°F may cause bursting.

STORAGE & DISPOSAL

STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not state to but vehicle or in

ills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If emply. Do not reuse emply container. Place in trosh or offer for recycling if available. If partially lilled: Call your local solid waste agency for disposal instructions.

Dischilarer: To the extent allowed by low, UDAP Industries, Inc shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local low enforcement afficials about regulations concerning this product. Meter: As part of an ongoing research project, UDAP Industries needs your true occount of UDAP Pepper Power" use against bear attacks. Please call 1-800-232-7941 for



DO NOT SEEK OUT ENCOUNTERS WITH BEARS, THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEAKS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. KEEP OUT OF REACH OF CHILDREN

Strong irritant to eyes, rose and skin. Wash thoroughly with soop and water after handling. See Side Panel for additional precautions.

Active Ingredients:
Capsoicin and related capsoicinoids* 2.0%
inert ingredients 98.0%
TOTAL 100.0%
"Made from Oleoresia of Capsicum 100.0%

UDAP Industries, Inc. P.O. Box 4872 Butte, MT 59702 1-800-232-7941

Produced by a grizzly attack survivor! CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 7.9 ounces (225g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or oppoor filindly to attack humans.

Do not seek out encounters with bears or ententionally graveler them. This product may not be effective in all situations or prevent oil injuries. Do not a control to the control of the spray this product on tents, other objects, or on dothing. Such use has ne deterent effect on bears. Keep sofety clip in place except when practicing with or using the product. Do not eat or allow to be extent any food or feed motionis which may have become contaminate unaised with this product. Use with contion. Cortents will cause poin and temporary impairment to eyes, nose, mouth and lungs, individuals who suffer from estima or emphysema may

This product has a range of up to 30 feet (9 meters). This resistor amounts completely in approximately 4 seconds [225g container] 5.4 seconds [260g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm

APPLICATION DIRECTIONS: Special procedures must be followed to arm the continues, groph, the product, and restore the softey dip to dissum the continues. Before judging this product in the busy country, and the directions and familiarity yourself with these procedures. If you test her this continues, to so with your books in the wheat on once more from people and beens. Do not test then People Power in an exert where you plan to carms, but it his, or this, Do not tested the form of the send of in some cases, you may have to wait until the bear is quite close before surplying. If the bear makes it though the initial borst of spray, cominue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Raplace sefery clip

Training canister



KEEP OUT OF REACH OF CHILDREN



Bur Bir Lane

No. Continues 5.3 center (200)

DIRECTIONS

10 ABA ABD APPS: Pero foreinger brough loop in honde with fruent in cent of untry loop in honde with fruent in cent of untry loop in honde with fruent in cent of untry loop. 11 When the honde with fruent in cent strught both. This will empote the higher less that of spray Jing 22. This chould be look one or. the situation bear in changed bear of the period bear of period bear other, the seat of period bear of period

TO DESARM: Replica salvey sky or Manhalan



Itano 3054



Aerolsol Safety Case





in Bear Country To Deter Ben from Aggressive Attacks!

Geta-Grip **Mounting System**



Appendix B Page 2 of 6

bear

APPENDIX B PAGE 3 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM

Bear Attack



Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark sulfered extensive bite lacerations to the head and neck, what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

Appendix B Page 3 of 6

APPENDIX B PAGE 4 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM



Appendix B Page 4 of 6



APPENDIX B PAGE 5 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM



Appendix B Page 5 of 6

APPENDIX B PAGE 6 Item BSK Bear Spray Kit Bc 15/11/11 11:06 AM



Appendix B Page 6 of 6

APPENDIX C PAGE 1 Item 12GM Bear Spray Bike 15/11/11 11:06 AM

Geta-Grip Mounting System **Be Prepared** Pre-tapped Holes for Water Bottle Mount! in Bear Country To Deter Bears from Aggressive Attacks! 30 Foot Fog! **UDAP Bear Defense Products** EAR SPRAN IKE MOUNT NET CONTENTS DESCRIPTION #12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster

Mount's **Bear Spray** Almost Anywhere!

(Cabins, Boats. ATV's Doorways Etc.) #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Halster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP -13.4oz - 380g - Bear Spray w/Hip Holster #18CP -13.4oz - 380g - Bear Spray w/Chest Holster **Bear Spray Accessories**

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Produced by a grizzly bear attack survivor!

Be Prepared!

Thank you for purchasing this product.

800 BEAR 941 (2327)

Works on All Bear Species

#12GM **Bear Spray** with Geta Grip **Bike Mount**

Appendix C Page 1 of 2

APPENDIX C PAGE 2 Item 12GM Bear Spray Bike 15/11/11 11:06 AM



Bear Attack

Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

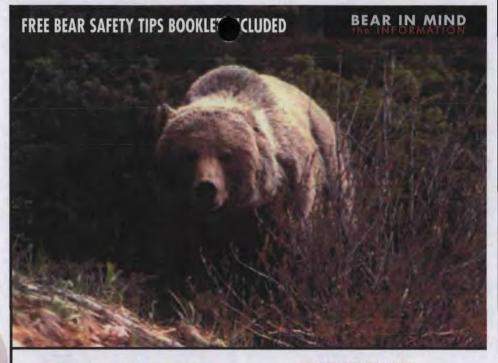
Read Carefully the entire label upon purchase Do NOT store in Hot vehicle or in direct sunlight

Geta-Grip Mount's **Bear Spray** Almost Anywhere!



Most Bear Attacks Involve a Mother with Cub(s)





PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash tharoughly with soop and water after handling. Remove contaminated clothing and wash clothing before reuse.

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off conteminated clothing. Rinse skin immediately with plenty of water for 15--20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture ar incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trush or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. **Note:** As part of an angoing research project, UDAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size].
This consister emption completely in approximately 7 seconds [380g container], 5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION DIRECTIONS. Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power* in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nazzle to not restrict for more man of not a second, After restricting, clean nozze and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on cut of safety clip (Fig. 1). With humb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the articking been is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some coses, you may have to woit until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Replace safety clip as illustrated (Fig. 3).



Related Capsaiciniods

BEAR SPRAY with BIKE MOUNT



Appendix C Page 2 of 2

APPENDIX D PAGE 1 Item 12IP Bear Spray With In 15/11/11 11:06 AM Hip Holsten and Training Can

30 Foot Fog!

Ulfpower.

III D SPRA

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION

#12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster

#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster

#15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster

#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster

#18 - 13.4oz - 380g - Bear Spray (can only)

#18HP-13.4oz - 380g - Bear Spray w/Hip Holster #18CP -13.4oz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations

ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sensel

Thank you for purchasing this product.

Produced by a grizzly bear attack survivor!

800 BEAR 941

Works on All Bear Species

Be Prepared!

Appendix D Page 1 of 2

APPENDIX D PAGE 2 Item 12IP Bear Spray With I 15/11/11 11:06 AM



Bear Attack

Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country
To Deter Bears from Attacking Humans

Read Carefully the entire label upon purchase Do NOT store in Hot vehicle or in direct sunlight

Hip Holster Included

Shoot from the Holster designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET / LUDED

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through fouching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soop and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST ALD

Have label with you when obtaining treatment advice

Have label with you when obtaining treatment advice IFON SKIN OR CLOTHING: Take off contaminated dothing. Rinse skin immediately with plenty of water for 15—20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES. Hold eye open and rinse slowly and gently with water for 15–20 minutes. Remove control lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378. immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, Do not contaminate water by disposing of amused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container, Exposure to temperatures above 130° F-may cause bursting.

STORAGE & DISPOSAL

STORAGE. STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in direct sunlight.

Spills: Coll 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Dischaimer: To the extent allowed by low, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Nate: As part of an angoing research project, UDAP Industries needs your true account of UDAP Pepper Power* use against bear attacks. Please call 1-800-232-7941 for details.

DIRECTIONS FOR USE

BEAR IN MIND

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on dathing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size].
This product has a range of up to 30 feet [260g, 225g size].
This consists amplies completely in approximately 7 seconds [380g container],
5.4 seconds [260g container], 4 seconds [225g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety dip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Papper Power in an area where you plan to camp, hunt, hike, or list. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly out occurriely, the activities described in the column below.

TO ARM AND APPLY. Place foretinger through loop in handle with thumb an curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly offect the occuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue, spraying, aiming for the face. Shield your eyes and hace if you must face the

TO DISARM: Replace safety clip as illustrated (Fig. 3).



Fig. 3

Related Capsaiciniods

BEAR SPRAY WITH INERT TRAINING CAN



Appendix D Page 2 of 2

APPENDIX E PAGE 1 Item 12RIP Bear Spray With 15/11/11 11:06 AM

Hip Holsta & Inert Training Can

& BEAR SPRAY RELIEVER

30 Foot Fog!

UDAP powe

ルドン

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION #12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP-13.4oz - 380g - Bear Spray w/Hip Holster

Bear Spray Accessories

#18CP -13.4oz - 380g - Bear Spray w/Chest Holster

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boots and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327)

Stay alert

Works on All Bear Species

Produced by a grizzly bear attack survivor!

Be Prepared!

Appendix E Page 1 of 2

#12IP Bear Spray with Hip Holster and Inert Training Can

> Shoot from the holster design!

APPENDIX E PAGE 2 Item 12RIP Bear Spray With 15/11/11 11:06 AM



Bear Attack

Mark Matheny a grizzly bear attack survivor

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite locerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

Read Carefully the entire label upon purchase Do NOT store in Hot vehicle or in direct sunlight

Hip Holster Included

Shoot from the Holster designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)





FREE BEAR SAFETY TIPS BOOKLET INCLUDED

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through tauching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flome. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, lass, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an engoing research project, UDAP Industries needs your true account of UDAP Pepper Power use against bear attacks, Please call 1-800-232-7941 for details.

DIRECTIONS FOR USE

BEAR IN MIND

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This

product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphyserna may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This conister empties completely in approximately 7 seconds [380g container]. 5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the sofety clip to disorm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Papper Power* in an area where you plan to comp, hurt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with scap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

ID ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will respose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Replace safety dip as illustrated (Fig. 3).





Related Capsaiciniods

BEAR SPRAY WITH INERT TRAINING CAN & SPRAY RELIEVER





APPENDIX F PAGE 1 Item V2P Bear Spray 2 Pack 15/11/11 11:06 AM and Itelsters



UDAP Bear Defense Products

#12 - 7.9 oz-225g - Bear Spray (can only)
#12HP - 7.9 oz-225g - Bear Spray w/Hip Holster
#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster
#15 - 9.2 oz-260g - Bear Spray w/Hip Holster
#15CP - 9.2 oz-260g - Bear Spray w/Hip Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#18CP - 13.4 oz - 380g - Bear Spray w/Hip Holster
#18CP - 13.4 oz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosal safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to *react* under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

30 FOOT FOG SPRAY

Capsaicin & Related Capsaiciniods

2.0%

Item #

APPENDIX F PAGE 2 Item V2P Bear Spray 2 Pack 15/11/11 11:06 AM

PRECAUTIONARY STAT

DANGER: May cause ineversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avaid contact with skin or clothing. Wash thoroughly with soap and wafel after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Ruse skin immediately with plenty of water for 15–20.

minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eye open and ninse slawly and gently with water for 15—20 minutes. Remove contact lenses, if present

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15—20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue missing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container, Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE. STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hat vehicle or in direct sunlight.

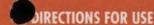
Spills; Call 1-800-535-5053 for CHEMICAL EMERGENCY.

DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty, Do not reuse empty container, Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disdoimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Control local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP PepperPower" use against bear attacks: Please call 1-800-232-7941 for details.

UDAP Pepper Power Bear Deterrent



It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. On not spray this product on tents, other objects, or an dorbing. Such use has no deterrent effect on bears. Keep safety the in place except when practioning with or using the product. Do not ent or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with courion. Contents will cause pain and temporary impairment to eyes, most, and lungs, individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 moters). This consterements completely in approximately 4 seconds [225g container] 5.4 seconds [260g container].

APPLICATION DIRECTION'S: Special procedures must be followed to ann the container, apply the product, and restore the sofety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yousself with these procedures. If you testfire this container, do so with your back to the wind in an area away from people and bears. Do not testfire PepperPowerTM in an area where you plan to camp, hunt, hike, or fish. Do not testfire for more than a half a second. After testfiring, clean nazzle and can with soop and water to remove residue. If you have not used this product before; you should obtain a UBAP training can and practice with it until you can perform, quickly and occurately, the activities described in the column below.

TO ARM AND APPLY: Place foretinger through loop in handle with thumb on curl of safety dip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Decress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 7). This should be done as the attacking bear is charging toward you and is about 40 feet oway (2-3 seconds from reaching you). Be aware that wind or min can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, pirning for the face. Shield your eyes and face if you must face the wind. TO DISARM. Replace safety clip as illustrated. (Fig. 3).







Fig.

BE PREPARED!

UAP 5

Capsaicin & Related Capsaiciniods

2.0%

BEAR SPRAY 2 PACK

#VZP-Bear Spray w/ Holster 2PK.

Appendix F Page 2 of 2

12434 0

APPENDIX G PAGE 1 Item VIP Bear Spray With In 15/11/11 11:07 AM + Inext Training Canister + Holster

30 FOOT FOG SPRAY

Item #



BEARR

SPRA

UDAP Bear Defense Products

#12 - 7.90z-225g - Bear Spray (can only)
#12HP - 7.90z-225g - Bear Spray w/Hip Holster
#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster
#15 - 9.2 oz-260g - Bear Spray (can only)
#15HP - 9.2 oz-260g - Bear Spray w/Hip Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#18CP - 13.40z - 380g - Bear Spray w/Hip Holster
#18CP - 13.40z - 380g - Bear Spray w/Hip Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to *react*under pressure. Bear Attacks can be fast, often
leaving you no time to think, only time to react. We
strongly recommend you take time to familiarize
yourself with this products operation.
Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

Capsaicin &
Related Capsaiciniods

Appendix G Page 1 of 2

APPENDIX G PAGE 2 Item VIP Bear Spray With In 15/11/11 11:07 AM

DIRECTIONS FOR USE

the solution of Federal law to use this product in a manner inconsistent with its labeling.

appear likely to ottock humans 105 RESTRICTIONS: This product may be used only to deter beats which are attacking or

to omittee mon takes only should be sond beautiful to a see the soften from astimo or may have become contominated with this product, Use with courion, Contents will couse pain and prochicing with at using the product. Do not eat at allow to be eaten any took or feed materials which on dothing. Such use has no deterrent effect on bears, keep safety slip in place except when effective in all shoutions or prevent all injuries. Do not spray this product on tents, other objects, or Do not seek out encounters with bears or intentionally provoke them. This product may not be

This product has a range of up to 30 feet (9 meters). This consists emphies completely in ентриузетта ттау тауе о ттоге земете геоспол.

way into it filts entities and the product before, you should editing the product and practice with it until you do hold it second. After restrining, dean nozzle and can with soop and water to remove residue. If you PepperPower*** in on ocea where you plan to comp, hunt, hike, or fish, bu not sest-fire for more than containes, do so with your back to the wind in an orea away from people and bears. Be not testime country, read the directions and furnitionize yourself with these procedures. If you rest-the this product, and restore the safety clip to disorm the container. Before taking this product into bear APPLICATION DIRECTIONS: Special procedures must be followed to orm the contoiner, apply the Daeuguon 6,971 spunnes etc Daniquon 65231 spunnes e Ajepun

of spray, continue spraying, aiming for the face. Shield your eyes and lace if you must face the have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst that wind or rain can greatly offect the accuracy of the initial busst of spray, to some cases, you may heor is chorging toward you tent is about 40 leet away (2:3 seconds from reacting you). Be aware ever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking 1). With thomb, pull safety cip up and stroight book. This will expose the trigger lever, Depress trigger (BPA ARM APPET Place forefinger through loss in hards with thumb on cut of safety city (BPA MRA OF woled mickly and accurately, the activities described in the column below.

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2JAMINA DITZEMOD & 2HAMUH OT ZGRASAH 851 PRECAUTIONARY STATE

result in substantial but appropriate and injury, Avoid centred with askin or delibring. Wash thoroughly with seek and virginial and askin the seek and a seek that the seek and a seek and DANGER: May couse ineversible physical eye domage if sprayed in the eye. Contact through fouching or rubbing eyes may

eiter handling. Remove contaminated clathing and work clathing betore reuse

IF ON SKIN OR CLOTHING. Take off contomismed (forling, Rinse skin immediately with planty of water for 15-20 Have label with you when obtaining treatment advice.

minutes. Call a poison control center, doctor, or 1-600-858-7378 immediately for treatment advice.

with the fest 5 minutes, then continue insing eye. Call a paison control center, doctor, or 1-800-858-7378 immediately for IF IN EYES: Hold eye open and mase slowly and gently with water for 15-20 minutes. Remove contact lenses, if present,

PHYSICAL OR CHEMICAL HAZARDS Do not apply directly to water. Bo not contaminate water by disposing at unused material.

temperatures above 130° Finay cause bursting Contents under pressure, be not use as store near freat or open flame, be not puncture or incinentie container. Exposure to

STORAGE & DISPOSAL

reinperentier is above 120°F or below 32°F. Do not store in hot vehicle or in direct sunlight. STORE IN A COOL, DRY PLACE IMACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the

ZOURE CON 1-800-232-2023 FOR CHEMICAL EMERGENCY.

DISPOSAL DO NOT INCINERATE OR PUNCTURE

If empty. Be not reuse empty contained Place in trust or offer for recycling it avoidable. It purified (all your facel soils)

waste agency for disposal instructions.

your true occount of UDAP PepperPower" use against bear attacks. Please call 1-800-232-7941 for details. officials about regulations concerning this product. Moties he port of an origing research project, UDAP Industries needs consequential including death arising out of the use of, or including to use this product. Contact local lew enforcement to teach a property, less, will yill be with allowed by low with most small and the for demander, including the contract of th

Bear Deterrent UDAP Pepper Power



UPC Code #YPP-860r Spray W/ Training Corr.

+0000 +0001 0 **Number TBA**

Appendix G Page 2 of 2

WITH TRAINING CANISTER



APPENDIX H PAGE 1 Item VIRP Bear Spray with I 15/11/11 11:07 AM

Bean Determent +
Bean Epray Relievent
Training tea +
Hip Holsten









Capsaicin & Related Capsaiciniods

UDAP Bear Defense Products

#12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray (can only) #18HP -13.4oz - 380g - Bear Spray w/Hip Holster #18CP -13.4oz - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosal safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327)

Stay alert

RELIEVER INCLUDED BEAR SPRAY

FOOT FOG SPRAY

> Item # VRIP

APPENDIX H PAGE 2 Item VIRP Bear Spray with I 15/11/11 11:07 AM

IRECTIONS FOR USE

USE RESTRICTIONS. This product may be used only to deter bears which are offacking or It is a violation of Ferbral lovy to use this product in in manner inconsistent with its labelling,

appear likely to affack humans.

to amilitize ment tettine othy standardinal agrad langus, individuals who soliter from asthma may have become contaminated with this product. Use with coulon, Contents will couse poin and practicing with or using the product. Bo not eat or allow to be eaten any lood or feed materials which on dothing, Such use has no deterrent effect on bears, Keep safety clip in place except when effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or Be not seek out encounters with bears or intentionally provake them. This product may not be

This product has a range of up to 30 feet (9 meters). This constan emphase completely m

grandinal 5.4 seconds [260g common!]

have not used this product before, you should obtain a UDAP training can and practice with it until you o hold a second. After rest-hing, dean nozzle and can with soop and water to remove residue. If you PepperPower" in an area where you plan to comp, hunt, hike, at first. Do not test-fire for more then containes, do so with your book to the wind in an area away from people and bears. Bo not test-lire country, read the directions and familiarize yourself with these procedures. If you test-fine this product, and restore the safety clip to disarm the container. Before taking this product into bear APPLICATION DIRECTIONS: Special procedures must be followed to orm the container, upply the

wind. 10 DISARA- Replace safety dip as illustrated (Fig. 3). of spirity continue spicytime for the face. Shield your eyes and face it you must face the have to work with the bear is quite close before spraying. If the bear mokes it through the initial horst Yenr very century of the accuracy of this fortish but to the contract of spin to the contract of the contract bear is charging toward you and is about 40 feet oway (2-3 seconds from reaching you). Be oware lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking 11. With thumb, pull selety tilp up and smeight bock. This will expose the trigger lever. Depress trigger -giff, qib ytefoe to bus no drowth thiw ebrigh in gool inguordt segniterot eacht XXXXX ONA MAX OT can perform, quickly and accumtely, the activities described in the column below.

return in substantial but temporary eye injury, Avaid contact with skin or clothing. Wash thomoghly with soop and water DANGER: May cause ineversible physical eye damage if sprayed in the eye. Contoct through touching or nabing eyes may HAZARDS TO HUMANS & DOMESTIC ANIMALS TATE YAANOITUADIII 135

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ENVIRONMENTAL HAZARDS

To not apply directly to water. Do not contaminate water by disposing of unused material

PHYSICAL OR CHEMICAL HAZARDS

temporatures above 130 F may couse bushing Confents under pressure. Bo not use or store near hear or open flome. Do not puncture or incrnerate container, Exposure to

STORAGE & DISPOSAL

temperature is above 120°F or fielow 32°F. Do not store in hot vehicle or in direct sunlight. STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Bo not stare in places where the

DISPOSAL: DO NOT INCINERATE OR PUNCTURE ZDIIF: (OIL 1-800-23E-2023 FOI CHEWICH EWERGENCK)

worse agency for disposal instructions the maty. De not reuse empty continues. Place in trash or difer for recycling it available, it partially filled; call your local solid

your free account of UBAP PepperPower" use against bear officials. Please (all 1-800-232-794) for details. officials about regulations concerning this product. Motes As part of an ongoing research project, 199AP Industries needs consequential including death presing out of the use of, or imbility to use this product. Contact local low enforcement Disclaimer: to the extent allowed by low, UDAP Industries, Inc. shall not be liable for duringe, rejury, loss,, direct or

Bear Deterrent 19Wof 19qq99 GAGU





WITH TRAINING CANISTER **SEAR SPRAY**

& BEAR SPRAY RELEIVER

Related Capsaiciniods

Appendix H Page 2 of 2

5-907231

UDAP Industries Inc. 13160 Yonder Road Bozeman, MT 59718 406-494-9292

October 14, 2011 EPA Registration Number 72007-1

Daniel B. Peacock, Biologist Insecticide, Rodenticide Branch Registration Division (7504C) Office of Pesticide Programs, EPA

RE: **UDAP Pepper Power Bear Deterrent EPA Registration Number 72007-1** Application for an amendment to approve labeling for a Bear Spray Kit for sale in retails stores.

Dear Mr. Peacock,

Thank you for calling me back the other day. As you instructed on the phone, I am sending you the labeling for approval of our bear spray kit amendment from December 8, 2008 that appears to have been lost for the second time. I did do a bit of work to try to make it easier for the EPA. I separated the kits that we would like to get approved by item and they are in order by appendix and page numbers. The amendment is to add the new labeling for Bear Spray Kits to be sold in retails stores. This labeling is an addition to UDAP labeling already on file with the EPA.

UDAP Industries Inc. wishes to add new labeling for our Bear Spray kits to the UDAP Pepper Power Bear Deterrent EPA Reg. No. 72007-1. The Bear Spray Kits will include a bear spray with holster, along with these accessories:

 Inert bear spray canister (which contains no active ingredients) for training purposes,

2. Aerosol Safety Container for safe storage of bear spray,

 Aerosof Safety Container for safe storage of bear spray,
 GetaGrip bear spray mount for bicycles and other areas bear spray may be needed.

4. Decontamination Spray in case of accidental discharge of bear deterrent

Please note not all accessories will be included in each kit. Different combinations will be used for each item number below. The labeling will reflect only those Items included. UDAP Industries, Inc. feels that the public can benefit from these kits. Each accessory enhances the safety for the end user.

UDAP Industries Inc. is providing a label for each kit. Along with separate labels of the other items where needed (See Appendix A).

The following are bear spray kits that we would like to include in our registration.

- 1. Item BSK Bear Spray Kit (See Appendix B).
- 2. Item 12GM Bear Spray with Mount (See Appendix C).
- 3. Item 12IP Bear Spray with Inert training Canister (See Appendix D).
- Item 12RIP Bear Spray with Inert training Canister & Reliever Spray (See Appendix E).
- 5. Item V2P Bear Spray with Holster 2 Pack Orange (See Appendix F).
- 6. Item VIP Bear Spray with Inert training Canister Orange (See Appendix G).
- Item VRIP Bear Spray with Inert training Canister & Reliever Spray Orange (See Appendix H).

Sincerely,

Gina Storey

Sales Manager UDAP Industries Inc. Email: Faxes@udap.com



MILODRAGOVICH, DALE STEINBRENNER & NYGREN P.C.

ATTORNEYS

MICHAEL J. MILODRAGOVICH LON J. DALE GERALD W. STEINBRENNER CHRISTIAN T. NYGREN G. PATRICK HAGESTAD ELIZABETH A. O'HALLORAN PERRY J. SCHNEIDER

CORY R. GANGLE W. ADAM DUERK P. BRAD CONDRA GIOVANNA M. MCLAUGHLIN CHRISTOPHER DECKER HANNAH STONE DYLAN M. MCFARLAND E-Mail: nygren@bigskylawyers.com

Sent via Federal Express

Phone 703-305-5407

March 11, 2011

Daniel B. Peacock, Biologist Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501

UDAP Pepper Power Bear Deterrent RE: EPA Registration Number 72007-1

Dear Mr. Peacock:

Our File No. 12378/2

On March 1, 2011, UDAP was informed by a distributor that due to safety reasons it has decided to sell a competitor's brand of bear spray. The safety reason was the fact that UDAP Bear Spray does not have a spray duration of 6 seconds. The Interagency Grizzly Bear Committee (IGBC) has published an official white paper with recommendations for purchasing bear spray. I have included the IGBC official document with this letter and a copy of Counter Assault's brochure using the document for an unfair advantage. UDAP has never seen efficacy data that supports a recommendation for spray duration. I have included with this letter the study "Efficacy for Bear Deterrent Spray in Alaska" by Tom Smith and other researchers. I have also included a written statement by Tom Smith about the recommendation of spray duration.

UDAP Industries, Inc., is disappointed because we pay at least \$15,000 per year to EPA for regulatory fees. This includes a \$3,250 federal registration fee and fees for state registrations. If UDAP pays to have a product regulated by the EPA, why is a different part of our government (IGBC is a government committee) acting as the authority on bear spray?

Basically, with their recommendations for purchasing bear spray, they are telling the public and end users that UDAP products are not to be purchased. Only this one brand (Counter Assault) meets the recommendations and has a clear advantage over the rest of the competition. The recommendation is an implied endorsement of UDAP's competitor and Counter Assault is using it to their advantage. This

Daniel B. Peacock, Biologist March 11, 2011 Page 2

does not allow for a level playing field and is a determinate for past and future business. UDAP's product is not failing to perform its function. Over the course of 13 years of having regulated products on the market, we have shown numerous accounts of our product's effectiveness. UDAP has expressed this in many letters to the EPA and the IGBC. UDAP believes the EPA has previously turned a blind eye to our many complaints. Now, it would like attention to this matter.

To resolve the problem UDAP requests EPA to officially state, for regulation purposes, that a 4 second spray duration is standard minimum to effectively deter bears. My question is whether IGBC sets regulatory standards or does the EPA? There appears to be a conflict of interest hetween the two agreeing which affects fair competition between private suppliers. For this reason, UDAP requests the EPA set the standards for minimum spray duration at 4 seconds to deter a bear.

Sincerely,

MILODRAGOVICH, DALE STEINBRENNER & NYGREN, P.C.

Christian T. Nygren

CTN:lhm
L-tworldox/DOCS/CLIENTFL\12378\002\LTR\00243931.WPD

bcc: Mark Matheny

Email: bears@udap.com

Tim Lynch

Email: timl@udap.com

Client Files\12378\002\LTR\00243931.WPD

IGBC Bear Spray Recommendations

The IGBC does not endorse, promote or guarantee any commercial product.

The following are only recommendations. The IGBC does recommend the use of bear spray as an effective tool when used in conjunction with proper bear avoidance safety techniques. Bear spray is not a substitute for following proper bear avoidance safety techniques. (Never approach, attempt to follow, interact with, or feed a bear)

No deterrent is 100% effective, but bear spray has demonstrated success in fending off charging and attacking bears and preventing, or reducing injury to the person and animal involved. The proper use of bear spray may reduce human injuries caused by bears, the number of grizzly bears killed in self-defense, and help promote the recovery and survival of the grizzly bear.

Selecting and buying a bear spray:

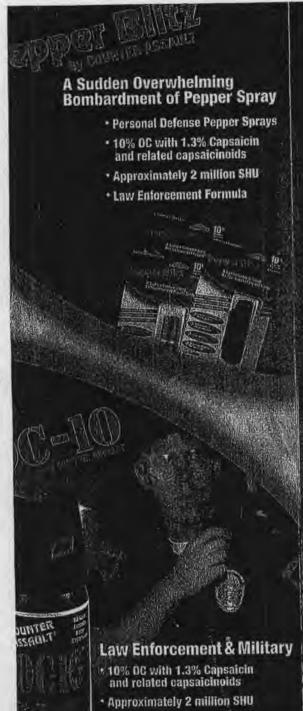
- To purchase the correct product, ask the sales person specifically for Bear
- All bear sprays MUST be registered with the Environmental Protection Agency (EPA). Purchase products that clearly state "for deterring attacks by bears." The EPA registration number is displayed on the front label.
- The active ingredient is clearly shown on the label and is 1% to 2% Capsaicin and related Capsaicinoids. The active ingredient is what affects the bears eyes, nose, mouth, throat and lungs.
- Personal defense, law enforcement or military sprays, (often referred to as "pepper spray") may not be formulated, contain the correct ingredients or have the proper delivery system, to divert a charging or attacking bear.
- Suggested spray duration of 6 seconds to compensate for multiple bears, wind, bears that may zigzag, circle, or charge repeatedly, and for the hike out.
- Suggested spray distance of 25+ feet to reach the bear at a distance sufficient for the bear to react to effects of the active ingredients in bear spray in time to divert its charge and retreat.
- Each person working or recreating in bear habitat should carry a can of bear spray in a quickly accessible fashion. Bear spray should also be readily available in the sleeping, cooking and toilet areas of a camp.
- Be sure the expiration date on each can of bear spray is current.

For a List of Bear Spray Manufacturers visit the EPA's website at: http://www.epa.gov/region8/toxics/pests/beardeter.html

For more information visit: www.igbconline.org/ for the Bear Spray Overview Report-2008 and www.BeBearAware.org.



OCFWI.org



Accessories

also available from Counter Assault



- · Bear-resistant Food Container
- Meets USFS Specifications
- · Certified by IGBC & SIBBG



- · Bear Spray Transportation & Storage Safety Container
- · Meets USFS Specifications
- · Conforms to 9667-2823-MTDC



- 8,000-9,000 Volts
- 0.11 Joule Rating
- 43 Square Feet
- 35-45 Pulses/Minute
- Meets or Exceeds USFS Specifications
- · Recreation Tech Tip 0723-2305-MTDC



WESTERN INCHES Bear Spray Works on all hear species to deter bears from attacking humans



Enjoy ilm. Outdoors with Confidence

1201/jdustral/Codrt, = Kalispel(Mjr/5 Projet (800) 695 3394 NFAX (460) 25



Counter Assault is proud of our participation in the research, development, and field testing of bear spray, in the mid 80's Counter Assault worked with the University of Montana and provided the formulation and spray nezzle used in bear spray. These features enable our bear spray to disperse an atomized cloud that reaches more than 30 feet and sprays longer than 7 seconds. The cloud populates into the mouth, throat, lungs, and nasal passages while also affecting the bear's eyes. This is why Counter Assault has been the leading bear spray since 1986.

Only Bear Spray that meets or exceeds the IGBC recommendations

Recipient of the 1998 IGBC Stewardship Award in recognition for the research and development of bear spray in conjunction with The University of Montana Border Grizzly Project

* Developer of high emission "atomized" fire extinguisher-style spray used in bear deterrents IGBC Bear Spray Recommendations

Excerpts from IGBC White Paper Selecting and buying a bear spray:

- MUST be registered with the Environmental Protection Agency. Purchase products that clearly state "for deterring attacks by hears."
- The active ingredient is 1% to 2% Capsaicin and related Capsaicinoids.
- Suggested spray duration of 6 seconds to compensate for multiple bears, wind, bears that may zigzag, circle or charge repeatedly and for the hike but
- Suggested spray distance of 25+ feet to reach bear at a distance sufficient for the bear to react to effects of the active ingredients in bear spray in time to divert its charge and retreat
- Each person working or recreating in bear habitat should carry a can of bear spray in a gulckly accessible fashion.

For a list of bear spray manufacturers, visit the EPA's website at: http://www.epa.gov/region8/toxics/pests/beardeter.html

For more information visit; www.ighconline.org for the Bear Spray Overview Report-2008 and BeBearAware.org.

designed to accommodate pepper spray manufacturing. We have continually expanded and refined our lacility with antinovative approach to ensure the *Highest Quality With Proven Technology for Your Safety!*

Counter Assault, Montana's only complete pepper spray manufacturer, is located in Kalispell; Montana in a facility specifically

CARRY WHAT THE PROFESSIONALS CARRY! COUNTER ASSAULT BEAR DETERRENT

Recipient of 1998 Interagency Grizziy Bear Committee* (IGBC) Stewardship Award for Research and Development of Bear Pepper Spray

All products in this comparison chart have met EPA requirements and are registered by EPA Chart EPA Approved 03/30/09

Current Registrant		Counter Assault		: McNall River Ent.	OD.	AP.	Security E	gaipmeit.
Date EPA Registered		May 12, 1998		U. Dec 22, 1998	March (18, 1999)		5 July 17, 2000	
Manufactured by		Counter Assault		Gonfract Filler	deontract Filler		Security Equipment	
Brand Name		Counter Assault		Guyrd Alaska	Pepper Power		Frontlersman	
IGBC* Recommendations		E ATT						
Minimum Net Welght	7.9 oz 225 gr	8.1 oz. 230 gr	10,2 oz 290 gr	9 oz 255 gr	7.9 cz: 225 gr	9 2 oz 260 gr	7,9,0z 225 gr	9,2 jz 260gr,
Capsaicin & Related Capsaicinoids	1%-2%	2%	2%	1.3%	2%	12%	2%	29
Cloud Spray Pattern		YES	YES	Yes	Yes	Yes	Yes	Yer
Minimum Spray Distance	25 ft	30 ft	32 ft	15-20 ft Poss NOT most IGBC Req. 11	30.0	30 ft	30 ft	35 _C
Minimum Spray Time	6 sec	7.2 800	9.2 800	9/sec	Does NOT in		Does NOT me	of landies:
Meets All IGBC* Recommendations?		YES! Meets All IGBC* Recommendations!		.00	NO A		10	

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Management and Conservation Note

Efficacy of Bear Deterrent Spray in Alaska

TOM S. SMITH, Wildlife Sciences Program, Faculty of Plant and Wildlife Sciences, Brigham Young University, 451 WIDB, Provo, UT 84602, USA STEPHEN HERRERO, Environmental Science Program, Faculty of Environmental Design. University of Calgary, Calgary, AB T2N 1N4, Canada TERRY D. DEBRUYN, United States National Park Service, Alarka Support Office, 240 W 5th Avenue, Anchorage, AK 99501, USA JAMES M. WILDER, Minerals Management Service, 3801 Centerpoint Drive, Suite 500, Anchorage, AK 99503-5823, USA

ABSTRACT We present a comprehensive look at a sample of bear spray incidents that occurred in Alasks, USA, from 1985 to 2006. We analyzed 83 bear spray incidents involving brown bears (Ursus arctos; 61 cases, 74%), black bears (Ursus americanus; 20 cases, 24%), and polar bears (Ursus maritimus; 2 cases, 2%). Of the 72 cases where persons sprayed bears to defend themselves, 50 (69%) involved brown bears, 20 (28%) black bears, and 2 (3%) polar bears. Red pepper spray stopped bears' undesirable behavior 92% of the time when used on brown bears, 90% for black bears, and 100% for polar bears. Of all persons carrying sprays, 98% were uninjured by bears in close-range encounters. All bear-inflicted injuries (n=3) associated with defensive spraying involved brown bears and were relatively minor (i.e., no hospitalization required). In 7% (5 of 71) of bear spray incidents, wind was reported to have interfered with spray accuracy, although it reached the bear in all cases. In 14% (10 of 71) of bear spray incidents, users reported to have interfered with spray accuracy, although it reached the bear in all cases. In 14% (10 of 71) of bear spray incidents, users reported to have interfered with spray accuracy, although it reached the bear in all cases. In 14% (10 of 71) of bear spray incidents, users reported to spray having had negative side effects upon themselves, ranging from minor initiation (11%, 8 of 71) to near incapacitation (3%, 2 of 71). Bear spray represents an effective alternative to lettal force and should be considered as an option for personal safety for those recreating and working in bear country. (JOURNAL OF WILDLIFE MANAGEMENT 72(3):640-645; 2008)

DOI: 10.2193/2006-452

KEY WORDS Alaska, bear deterrent spray, bear-human interactions, black bears, brown bears, polar bears, Ursus americanus, Ursus aretes, Ursus maritimus.

Throughout North America, bear-human conflict periodically results in serious, sometimes fatal, injuries to both bears and humans (Herrero 2002). These conflicts between bears and people include negative interactions that are aggressive, defensive, or nuisance in nature (Gore et al. 2006). A few studies have investigated bear-human conflict in North America (Herrero 1970; Middaugh 1987; Herrero and Higgins 1999, 2003; Miller and Tutterow 1999). Miller and Tutterow (1999) reported that brown bear (Ursus arctos, synonymous with "grizzly bear" and hereafter brown bear) attacks resulted in 2.75 injuries and 0.42 deaths per year in Alaska, USA, from 1986 to 1996.

Miller and Chihuly (1987) found that 72% of nonsport brown bear deaths in Alaska were the result of aggressive bear-human interactions. It is likely that some of these bear fatalities could have been avoided had nonlethal deterrents been available. On Alaska's Kenai Peninsula, the number of brown bears killed in defense of life or property has increased more than 5-fold in recent years and presently exceeds population sustainability (Suring and Del Frate 2002).

People rely on a variety of deterrents for protection from bears, including firearms, red pepper sprays, signal flares, incendiary screamers, and an assortment of noise makers (Herrero 2002). Red pepper spray repellants, hereafter bear spray, were initially developed in the 1960s as a defense against aggressive domestic dogs (Miller 2001). The active ingredients in bear spray, capsaicin and related capsaicinoid compounds, produce a nonlethal yet debilitating response, including coughing, sneezing, bronchoconstriction, apnea, retrosternal discomfort, laryngeal paralysis, and temporary blindness (Miller 2001). Miller (1980) tested dog repellent

sprays on captive brown bears and found that charging bears were stopped when sprayed in the face. Spraying resulted in swift retreats to the farthest corner of the cage where bears rubbed their eyes and blinked vigorously (Miller 1980). Encouraged by these results, Miller (1980) advocated the development of red pepper spray—based repellents for bear defense.

Initial tests of the improved formulation and packaging proved promising, so research trials were conducted involving captive bears (Hunt 1984). Rogers (1984) reported positive results when red pepper spray was used on free-ranging black bears (*Ursus americanus*). Importantly, none of these studies reported bears responding aggressively when sprayed.

Herrero and Higgins (1998) analyzed 66 nonexperimental incidents in which bear spray was used on both wild brown and black bears and found that in aggressive encounters with brown bears bear spray ended the bears' unwanted behavior in 94% (15 of 16) of incidents. However, in 6 cases the bear continued to act aggressively; in 3 of these cases the bear attacked the person spraying. In 88% (14 of 16) of the cases the bear(s) eventually left the area after being sprayed. Results regarding black bears were more variable, but no humans were injured after spray use.

Some people have been reluctant to rely on bear spray for protection. We believe several reasons contribute to their reluctance. Chief among these is the notion that bear sprays are too weak to dissuade curious or aggressive bears from approaching people. Additionally, some people believe that wind can easily render sprays ineffective and that wind-driven spray may incapacitate the user. We present data from Alaska bear spray incidents that address these concerns. Additionally, we present bear spray incidents involving polar bears (Ursus maritimus), the first reported in

¹ E-mail: tom_smith@byu.edu

the literature. Our goal was to provide data regarding the effectiveness of bear spray over a 20-year period. Given the overall lack of evaluation of the efficacy of bear-human conflict interventions, including bear spray, analysis of bear spray effectiveness is needed (Gore et al. 2006). Insight about bear spray efficacy may contribute to more informed decisions regarding its use and reduce human injury and nonsport loss of bears.

METHODS

We collected bear spray incident records from 1985 to 2006 from state and federal agencies, newspaper accounts, and anecdotally. We included all Alaska records (31) previously analyzed by Herrero and Higgins (1998) so we could present a comprehensive, updated assessment of bear spray incidents from Alaska. Bear spray incident variables of interest included date, time, location of incident, number of persons involved, person's activity before interaction, bear species and age-sex class, bear's activity before being sprayed, manufacturer of spray used, wind effects, effects on humans, dosage of spray administered, dosage of spray received, distance to bear when sprayed, bear's response to spray, mechanical problems, and whether the bear returned after being sprayed. Whenever records were incomplete (n = 10), we interviewed individuals involved. We regrouped values for the variable distance to bear when sprayed into broader categories to aid analysis (e.g., 0-5 m, ≥6-10 m, and ≥11-20 m). Subjectivity of incident records, presence of confounding factors (e.g., multiple manufacturer's products having been used), and small sample sizes limited statistical analyses.

We pooled bear spray incident data by bear species and bear behavior, consistent with Herrero and Higgins (1998). Data included incidents involving black, brown, and polar bears. We labeled bears curious if they were exploring the environment in a nonaggressive manner. We deemed bears aggressive when the encounter included behaviors such as charging, agonistic vocalizations, or persistent following (Herrero and Higgins 1998). In some instances, we could not infer the bear's behavior and we classified those behaviors as unknown.

We pooled data by behavior of the bear before being sprayed into 2 categories, food motivated and nonfood motivated, consistent with Herrero and Higgins (1998). Bears in the first category were perceived to be searching for human food or garbage. If aggressiveness was involved in these incidents, it was with respect to acquiring food or garbage. Bears in the second category were acting aggressively, and they were not attempting to acquire food or garbage.

We defined successful outcomes as bear spray having stopped the undesirable behavior of the bear. A bear that no longer pursues a person, breaks off an attack, abandons attempts to acquire food or garbage, or turns and leaves the area are examples of successful outcomes. We deemed failures' spray incidents in which the bear continued its pursuit, persisted in attempts to acquire food or garbage, or showed no change in its undesirable behaviors. A bear not leaving an area after being sprayed, however, was not deemed a failure so long as threatening behaviors, rummaging through trash, or direct risks to people ceased.

To address wind effects on spray, we tested the velocity of bear spray issuing from canisters at the actuator, or nozzle, using a Kestrel wind meter (Nielsen-Kellerman, Inc., Sylvan Lake, MI). We held the meter approximately 5 cm from the actuator and released a 1-second burst of spray. We recorded maximum wind speed attained. We replicated this procedure 5 times to calculate a mean exit velocity for bear spray. We used the G test for goodness-of-fit for differences between observed and expected frequencies (Dytham 2003). We selected the G test because we were dealing with observed frequencies of various categories and expected proportions for those categories that we did not derive from the data. We set significance at P = 0.05.

RESULTS

We analyzed 83 cases involving the use of bear sprays in Alaska (Table 1), of which 72 incidents involved persons spraying menacing bears, and the remainder (n = 11) are examples of spray misuse or bear attraction to residues. We address instances of bear spray misuse separately.

From 1985 to 2006, our sample of bear spray incidents showed that Alaska averaged 3.1 ± 0.7 reported bear spray incidents per year. Of the 83 incidents we examined, brown bears were involved in 61 (74%), black bears in 20 (24%), and polar bears in 2 (2%; $G_I = 96.6$, P < 0.001). Of the 72 cases where persons defensively sprayed bears, 50 (69%) involved brown bears, 20 (28%) black bears, and 2 (3%) polar bears ($G_I = 73.0$, P = 0.000). All instances of spray misuse (n = 11), or of spray residues attracting bears, involved brown bears. In 92% (46 of 50; $G_1 = 41.4$, P <0.001) of close-range encounters with brown bears, spray stopped undesirable behavior in which the bear was engaged. In 90% (18 of 20; $G_2 = 14.7$, P = 0.001) of close-range encounters with black bears, spray stopped the bear's undesirable behavior. All bear-inflicted injuries (n=3) involved brown bears and were relatively minor (i.e., no hospitalization required). During 1985-1995, Herrero and Higgins (1998) found bear spray use in Alaska 94% effective overall (30 of 32 incidents; $G_2 = 31.3$, P <0.001); we found that in the decade following bear spray, efficacy was 90% (36 of 41 cases; $G_1 = 33.4$, P < 0.001).

Bear spray incidents for which time of day was known (65%, 47 of 72) show that none occurred between 0100 hours and 0600 hours, 14 (30%) occurred between 0600 hours and 1200 hours, 14 (30%) occurred between 1200 hours and 1800 hours, and 18 (38%) occurred between 1800 hours and 2400 hours; only one (2%) occurred between 2400 hours and 0100 hours (Fig. 1).

In 96% (69 of 72) of bear spray incidents the person's activity at the time was reported (Fig. 2). The largest category involved hikers (35%), followed by persons engaged in bear management activities (30%), people at their home or cabin (15%), campers in their tents (9%),

Table 1. Bear spray incident data from Alaska, USA, 1985–1995 and 1996–2006. We did not include incidents of misuse (n = 11) with these data.

	Decade of study			
	1985-1995	1996-2006 ^b		
Total no. of incidents	32	40		
Black bears (total)	6	14		
Single bears	4	13		
F with cubs	2	1		
Brown bears (total)	26	24		
Single bears	21	11		
F with cubs	4	9		
Large M	0	2		
Pair of bears	1	2		
Polar bears (total)	0	2		
Single bears	0	. 2		
Injuries inflicted ^e	0	3		
Successful deterrence (no.)d	30	36		
%	94	90		
Return after spraying	5	8		
Mean distance to bear (m)	3.4	4.8		
Behavior before spraying				
Aggressive	9	16		
Curiosity	23	23		
Indeterminable	0	1		

* Data from Herrero and Higgins (1998).

b Date from this study.

Minor injuries resulting in outpatient treatment (e.g., scratches and lacerations).

^d Spray was deemed successful when the undesirable behavior of the bear was supped.

* No. of incidents in which the bear returned after initial spraying.

people working on various jobs outdoors (4%), sport fishers (4%), a hunter stalking a wounded bear (1%), and a photographer (1%). Persons injured in bear spray incidents included 2 hikers and one field biologist.

In 62% (31 of 50) of brown bear incidents bears were either acting curious or searching for food or garbage before being sprayed. Of these bears, 13% (4 of 31) were acting aggressively with respect to obtaining food; 87% (27 of 31) were not acting aggressively. In 77% of incidents (24 of 31), one bear was involved, but in the remaining incidents females with cubs made up 10% (3 of 31), large males 7% (2 of 31), and a pair of siblings 7% (2 of 31) of bears involved. In 100% (29 of 29; $G_7 = 32.8$, P < 0.001) of these incidents, use of bear spray stopped the undesirable behavior of the bears involved. In 17% of incidents (5 of 29; $G_7 = 13.5$, P = 0.001), the bear returned after being sprayed.

In 68% (13 of 19) of black bear incidents, bears were either acting curious or were searching for food or garbage. Of these bears, none acted aggressively toward people while in pursuit of human foods. In 77% (10 of 13) of these incidents, one bear was involved, but the remaining 23% (3 of 13) involved family groups. In 85% (11 of 13; $G_1 = 6.9$, P = 0.032) of these incidents, bear spray stopped the bear's behavior, whereas in 15% (2 of 13) the outcome was unclear due to confounding factors (i.e., bear trapped inside a structure and unable to flee, linkage between spraying and cessation of behavior unclear). In 11% (2 of 19; $G_2 = 13.6$, P = 0.001) of incidents, the black bear returned to the site following initial spraying.

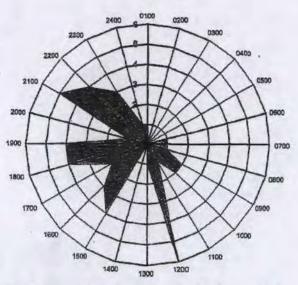


Figure 1. Temporal distribution of bear spray incidents by time of day (hr) in Alaska, USA, 1985–2006. Radial lines are time of day; concentric circles represent counts.

In both polar bear incidents, subadult bears approached humans in a pickup truck there to observe bears feeding on bowhead whale (Balaena mysticetus) remains near the village of Kaktovik, Barter Island, Alaska, USA. In both instances (100%), bear spray stopped the bear's approach and turned the bear away. Neither of these bears returned to the truck following spraying.

In 36% (18 of 50) of brown bear incidents, brown bears acted aggressively towards people before being sprayed. In 86% (12 of 14 for which distance was known) of these incidents, the person was first aware of the bear at <15 m, with a mean estimated distance of 6 m. In the remaining 2 instances, bears were first noticed at 25 m and 50 m, respectively. In 64% (9 of 14) of these close encounters, brown bears charged the person(s) before being sprayed. In 85% (12 of 14; $G_1 = 7.9$, P = 0.019) of aggressive encounters with brown bears, bear spray stopped the bear's aggressive behavior, in 12% (1 of 14) the person spraying the bear was not injured, but the bear charged through the fog, halting 1 m from the person before moving off. In 12% (1 of 14) of aggressive encounters the bear contacted and slightly injured the person in the interaction (i.e., deep scratches requiring stitches). Of brown bears involved in aggressive interactions unrelated to food procurement, 38% (6 of 16) were single bears, 56% (9 of 16) were females with dependent young, and 6% (1 of 16) were a pair of bears. In 3 instances (21%, 3 of 14) aggressive brown bears returned after being sprayed.

In 35% (7 of 20) of incidents involving black bears, bears acted aggressively towards people without an apparent food-related motive. In 4 of these 7 aggressive incidents, the bear was apparently surprised at close range (≤15 m). Only in one case (1 of 7, 14%) did the black bear charge before being sprayed. In 100% (7 of 7) of bear spray incidents

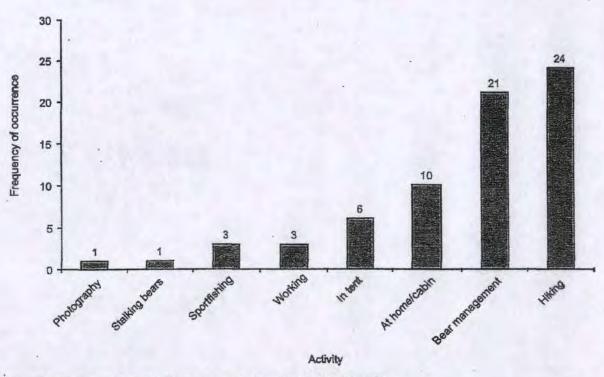


Figure 2. Primary activity of persons involved in bear spray incidents in Alaska, USA, 1985-2006.

involving aggressive black bears, the undesirable behavior was stopped by spraying. No one using bear spray was injured by black bears in any behavioral mode, aggressive, food seeking, or curious. Of black bears involved in aggressive interactions, 100% (7 of 7) were single bears, one reportedly a subadult and the others adults. After being sprayed, 3 bears (43%, 3 of 7) returned, 3 did not return (43%, 3 of 7), and one (14%, 1 of 7) did not leave the general area.

In 7% (5 of 71) of bear spray incidents, wind was reported to have interfered with spray accuracy, although it reached bears in all cases. In 14% (10 of 71) of bear spray incidents, users reported spray having negative side effects upon themselves, ranging from minor irritation (11%, 8 of 71) to near incapacitation (3%, 2 of 71).

On 10 occasions (14%, 10 of 71) the sight and sound associated with spray release were reported as key factors in changing bear behavior. In 67 spray incidents for which distance was reported, the mean distance between user and bear at the time of spraying was 4 m (range 1-15 m). One user commented that he had "squarely hit the bear" at 10 m, although at distances >5 m success was variable. When bears were sprayed at ≤3 m (33 cases), the spray always enveloped the bear, with only one resulting in a failure to deter the attacking bear.

Three persons (<2% of the 175 persons involved in 71 separate incidents) suffered injury by bears that had been sprayed with bear deterrent. One person halted the attacking bear by spraying it at close range in the face,

and the other 2 persons were unable to spray a second dose because the initial attack knocked the spray canister from their hands. Nonetheless, only one of the 3 reported that the spray had failed to protect them. No mechanical failures of spray canisters were reported in the 71 cases.

We analyzed 11 incidents of spray misuse that resulted in unintended consequences. In 45% (5 of 11) of incidents, persons applied spray to objects they hoped to protect from damage by curious bears; these efforts all failed. In 2 instances (18%), persons applied sprays as a zonal repellent but reported bears inordinately attracted to these locations (i.e., tent and on river bank). In 2 instances (18%), persons reported bears attracted to spray residues following use of bear spray for practice purposes. Repeated sprays (n = 5) with fully pressurized cans showed mean exit velocities $>112 \pm 4$ km/hr (70 ± 2 miles/hr).

DISCUSSION

Two decades of bear spray use in Alaska confirm that it is an effective bear deterrent. Findings by Herrero and Higgins (1998) regarding the efficacy of bear spray in Alaska from 1985 to 1995 were comparable to ours for the following decade, 1996–2006. As there were only 2 incidents involving polar bears, these results should be interpreted with caution. However, we located 3 additional polar bear incidents, 2 from Russia and one from northern Canada, which support our findings (Cochran 2000, Ovsyanikov 2004). In Russia and Canada, bear spray successfully protected the user from injury by aggressive polar bears. The only injuries (n=3)

associated with bear spray usage in Alaska were inflicted by brown bears, consistent with findings by Middaugh (1987) and Herrero and Higgins (2003) that brown bears are the most aggressive of all 3 North American bear species.

We found little change in the overall efficacy of bear sprays between the 2 decades of study (94% vs. 90%), in spite of reported improvements by manufacturers (e.g., increased capsaicinoid content, pressure, and dispersal distance). Differences in bear deterrent spray brand formulation (e.g., % capsaicin, chemical carrier composition, and vol), spray duration, and distance exist, but our data were too few for rigorous performance comparisons or analysis.

In 18% of cases we analyzed (13 of 72), both brown and black bears resumed their threatening behavior after having been sprayed the first time. In these instances, repeated spraying eventually deterred bears such that the user could escape the situation. Bear spray diffuses potentially dangerous situations in the short term by providing the user time to move out of harm's way and allowing the bear time to reassess the situation and move on. When food or garbage is involved with bear conflict, bear spray is effective initially, but one can expect bears to continue returning until these attractants are removed or otherwise secured. In surprise encounter situations, bear spray buys time for both the human and bear to go their separate ways.

Consistent with others' findings regarding bear-human conflict, our data show hikers to be the largest group involved in bear spray incidents (Middaugh 1987, Herrero and Higgins 2003). This activity correlates with the most frequent time of day for bear spray use, between 0600 hours and 1800 hours (60%; Fig. 1). The increase in bear spray incidents in the evening (38%; 1800–2400 hr) was largely due to bear management activities.

Wind can influence bear spray's accuracy and distance; however, our data show that wind rarely affected the outcome of bear-human interactions involving bear spray, which is likely because many close encounters do not occur in open areas, but rather in dense brush or forests where wind is greatly attenuated (T. Smith, Brigham Young University, unpublished data; S. Herrero, University of Calgary, unpublished data). High exit velocities of spray from cans likely compensates for cross-wind effects and may account for the low incidence of wind-related effects reported in Alaska. Of the 72 incidents we studied, 4 (6%) involved persons that had to leave the area to alleviate burning eyes and coughing. No one reported being incapacitated by spray, although one user said he had to move or he would have been overwhelmed.

Importantly, latent bear spray residues have been found to attract brown bears rather than repel them (Smith 1998), which was evident in 7 instances in Alaska where persons applied bear spray to objects with the intention of repelling bears. Unfortunately, bears were attracted to, and subsequently destroyed, the property that had been coated with bear spray, similar to observations reported by Smith (1998). These observations underscore a need to carefully manage spray residues by not indiscriminately dispersing spray.

Because some persons had to spray bears multiple times to drive bears off in 24% (17 of 72) of instances we studied, spray conservation, and total canister volume, may be concerns. We suggest discarding bear spray when contents fall below 90% of the original amount (as determined by weighing), or when the canister is past its expiration date, generally 3-4 years from date of purchase.

Management Implications

Our research shows that bear deterrent spray is an effective tool for defusing bear-human conflict in a nonlethal manner. In Alaska, bear spray was highly effective in dealing with all 3 species of North American bears, although more data on polar bear responses is needed. Persons working and recreating in bear habitat should feel confident that they are safe if carrying bear spray. Although bear spray was 92% effective by our definition of success, it is important to note that 98% of persons carrying it were uninjured after a close encounter with bears.

In portions of North America where bears are in decline managers may reduce the number of bears killed in defenseof-life by arming employees with bear deterrent sprays in addition to firearms. No bear spray has ever been reported to kill a bear. It is our belief that widespread use of bear spray will promote human safety and bear conservation.

Acknowledgments

We thank the many persons who provided incidents for this analysis. We also thank those who provided additional insight regarding their specific encounters. We are grateful for the constructive comments of M. Morrison, M. Chamberlain, M. Gore, and anonymous reviewers at the Journal of Wildlife Management. Additionally, we thank P. Johnson of Counter Assault and M. Matheny of UDAP Bear Spray for sharing insight regarding this manuscript. C. Bartlebaugh of the Center for Wildlife Information supplied many helpful comments. We thank C. Perham of the United States Fish and Wildlife Service in Anchorage for supplying polar bear incident data. We also thank A. Higgins who worked with S. Herrero in recording and analyzing the 31 cases of bear spray use in Alaska for a previous paper.

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Associate Editor: Gore.

Tim @ UDAP Pepper Power

From: "Thomas Smith" <tom_smith@byu.edu>

To: "Tim @ UDAP Pepper Power" < timl@udap.com>

Cc: "Steve Herrero" <herrero@ucalgary.ca>
Sent: Friday, April 09, 2010 11:20 AM

Subject: RE: Tom Smith's letter

Hi Mark,

I've been out in the field and so missed your call. To save time and to put this into writing I'll reply here by email. You are welcome to call, however, if you want more input. I know that Dr. Herrero is out of town for 3 weeks and so won't be reachable. However, I feel I can speak for the both of us that no data we have justifies a specific duration or distance thus making one spray superior to others. I've spoken several times regarding this issue with Chuck Bartlebaugh of the CWI, he asking if I might be willing to take a stand on this, but I've declined every time due to a lack of supporting data. Chuck has been clear that his logic is that if a little is good, more must be better and that with bears one doesn't want to be marginal in deterrent attempts. I don't know anyone that would argue that - to a point – but to say that 5.8 seconds of spray is not adequate whereas 6.0 seconds is certainly stretches credibility. To this Chuck has countered that you often have to spray bears multiple times to deter them so more is better, and I agree... but was clear that splitting hairs, particularly when a product endorsement is on the line, doesn't sit well with me and that I would not support any such cutoffs in distance or duration. Clearly a UDAP can is capable of multiple one second sprays, just like the others, and a one second blast is usually all that is needed to make your point with the bear. Since the most anyone ever sprayed a bear in the 72 cases Dr. Herrero and I analyzed was 3 sprays (or 'emptied entire can') there certainly is nothing wrong with the UDAP product which can clearly deliver 3 sprays and/or allow the person to empty the can. As for distance, 75% of persons sprayed the bear at 5m or less (that's about 15 feet) and a UDAP can will certainly work at that distance. So I can't see any cutoff there that makes a valid case. We did have people spraying, or attempting to, bears at greater distances but again the data set is so small that one would be reckless attempting to base any guidelines on that. The fact that both Steve and I have been unwilling to draw a line in the sand with regard to distance and duration is a statement that we are not supporting those claims, or discounting them.... We simply have no data either way.

If the debate were centered on the utility of say Halt dog spray vs bear spray I'd have no problem supporting those who felt Halt was going to get people injured. Same goes for the personal defense sprays for human attackers — distance and

the way in which the spray is distributed would cause me concern... but that's not the debate here.

I hope that is somewhat helpful, though it's no different than my previous statements.

Sincerely,

Tom S.

Dr. Tom S. Smith
Associate Professor
Plant and Wildlife Science Department
451 Widstoe Building
Brigham Young University
Provo, Utah 84602

(801) 422-2151 (phone) (801)422-0008 (fax)

From: Tim @ UDAP Pepper Power [mailto:timl@udap.com]

Sent: Thursday, April 08, 2010 12:37 PM

To: Thomas Smith

Cc: Mark @ UDAP Industries Inc. Subject: Fw: Tom Smith's letter

Hi Tom.

I hope things are well for you and yours. What have you been doing these days?

I am emailing you, because I need your help. We had asked the Interagency Grizzly Bear Committee and The Center for Wildlife Information to reevaluate their bear pepper spray guidelines back in 2007. In 2008 they decided to keep the guidelines they had established for bear spray in 1999. I know we have had several conversations on this and I appreciate all the help and guidance you have offered on those occasions. We actually handed in your research to the IGBC, but it appears it was ignored.

The IGBC and CWI claim the guidelines were a result from a study done by Carrie Hunt and Dr. Charles Jonkel with Counter Assault bear sprays in the 1980s.

We have formally asked for the data pertaining to this. We have received the runaround once more and realize that there is in fact no data that supports this. I know you have been persuaded by CWI to add the guidelines to your research. I am thankful for your diligence in looking at the statistics and remaining scientifically accurate.

I know you and Dr. Herrero are experts on bear deterrents. I have read your study published in "The Journal of Wildlife Management" and find it very fascinating. I read in your study how the difference in spray volume and distance were not factors in deterring a bear. I remember that in a phone conversation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Tim Lynch UDAP Industries, Inc. 13160 Yonder Rd. Bozeman, MT 59718

DEC 0 2 2010

Dear Mr. Lynch:

Subject:

Labeling Amendment to UDAP Pepper Power Bear Deterrent

to Include Additional Package Labeling on Insert Card

EPA Registration No. 72007-1

Submission Date: September 29, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Jennifer Gaines at (703) 305-5967 or via e-mail, gaines.jennifer@epa.gov.

Sincerely yours,

John Hebert

Product Manager (07)

Insecticide-Rodenticide Branch Registration Division (7505P)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a paison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° f may cause bursting.

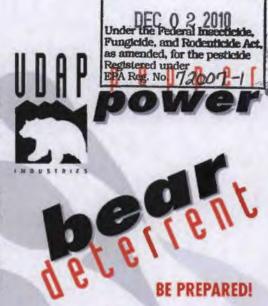
STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in direct sunlight.

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for details.



ACCEPTED

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

Active Ingredients:

Capsaicin and related capsaicinoids 2.0%

Inert ingredients TOTAL

98.0% 100.0%

*Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor! CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001

Net Contents: 7.9, 9.2 & 13.4 contes (225g, 260g & 380g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This conister empties completely in approximately 7 seconds [380g container], 5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power" in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and occurately, the activities

described in the column below. TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Replace safety clip as illustrated (Fig. 3).





Bear Pepper Spray



Works on All Bear Species

Bear Attack



Mark Matheny a grizzi bear attack survivor

UDAP Bear Defense Products

#12 - 7.90z-225g - Bear Spray (can only)
#12HP - 7.90z-225g - Bear Spray w/Hip Holster
#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster
#15 - 9.2 oz-260g - Bear Spray w/Chest Holster
#15HP - 9.2 oz-260g - Bear Spray w/Chest Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster
#18 - 13.40z - 380g - Bear Spray w/Hip Holster
#18CP - 13.40z - 380g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay alert

Capsaicin & Related Capsaiciniods

Be Prepared!

UDAP's "Shoot from the Holster" designs!

Item #

Appendix A - Page 1 of 2





Mark Mathema a griggly bear attack surviva

Bear Attack

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite locerations to the head and neck, bite locerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

Read Carefully the entire label upon purchase Do NOT store in Hot vehicle or in direct sunlight

Hip Holsters Included

Shoot from the Holster

designs, providing silent and easy access to the trigger.



Most Bear Attacks Involve a Mother with Cub(s)



Capsaicin & Related Capsaiciniods

BEAR SPRAY 2 PACK

UDAP Industries Bozeman, MT

PRECAUTIONARY STATEMENTS

FREE BEAR SAFETY TIPS BOOKLET LUDED

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated dothing and wash clothing before reuse.

FIRST AID
Have label with you when obtaining treatment advice IF ON SKIN OR CENTHING: Take off contaminated clothing. Rinse

skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for

IF IN EVES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to remperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY.

If empty. Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for

DIRECTIONS FOR USE

BEAR IN MIND

It is a violation of Federal low to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This

product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep sofety dip in place except when procticing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size].
This conister empties completely in approximately 7 seconds [380g container], 5.4 seconds [260g container], 4 seconds [225g container],.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and farmiliarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not with your occk to the wind in an area dway from people and bears. Vo not test-fire Peopler Power* in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, dean nozzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and occurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on cut of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware their wind or rain can greatly affect the occuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Replace safety clip as illustrated (Fig. 3).





Appendix A - Page 2 of 2

UDAP

Bear

Pepper Spray

Be Prepared!

Bear Attack



Chest Holster

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION

#12 - 7.9oz-225g - Bear Spray (can only)

#12HP - 7.9oz-225g - Bear Spray w/Hip Holster

#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster

#15 - 9.2 oz-260g - Bear Spray (can only)

#15HP - 9.2 oz-260g - Bear Spray w/Hip Holster

#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster

#18 - 13.4oz - 380g - Bear Spray (can only)

#18HP -13.4oz - 380g - Bear Spray w/Hip Holster

#18CP -13.4oz - 380g - Bear Spray w/Chest Halster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations

ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941

Stay alert



Works on All Bear Species

35 FOOT FOG

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

(2327)

Mark Matheny a grizzly bear attack survivor

#18CP

Bear Spray with Chest Holster

Appendix B - Page 1 of 4



Bear Attack

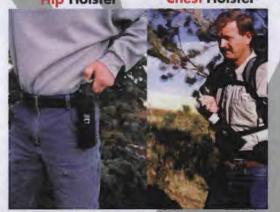
Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bohnson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahnson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country To Deter Bears from Attacking Humans

UDAP'S HOLSTERS

Shoot from the Holster designs, providing silent and easy access to the trigger.

> Chest holster can be converted to a hip holster. **Chest Holster Hip Holster**



Most Bear Attacks Involve a Mother with Cub(s)



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

FREE BEAR SAFETY TIPS BOOKLET INCLUDED

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Cantact through touching or rubbing eyes may result in tantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soop and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice

G: Take off contaminated clathing. Rinse skin immediately with plenty of water for 15—20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for

Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

OR CHEMICAL HAZARD

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. De

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY.

If empty Do not reuse empty container. Place in trash or offer for recycling if available filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. **Note:** As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for

DIRECTIONS FOR USE

BEAR IN MIND

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This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This canister empties completely in approximately 7 seconds [380g container], 5.4 seconds [260g container], 4 seconds [225g container],.

PPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power® in an area where you plan to camp, hunt, hike, or fish. not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until

you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on cut of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever, Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM, Replace safety clip as illustrated (Fig. 3).







Capsaicin & Related Capsaiciniods

Read Carefully the entire label upon purchase Do NOT store in Hot Vehicle or in direct sunlight

UDAP Industries Bozeman, MT







Bear Pepper Spray



Be Prepared!

Bear Attack



Mark Matheny a grizzly bear attack survivor

Copsolcin & Related Capsoiciniods



UDAP Bear Defense Products

#12 - 7.9oz-225g - Bear Spray w/Hip Holster #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray w/Chest Holster #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #15CP - 9.2 oz-260g - Bear Spray w/Chest Holster #18 - 13.4oz - 380g - Bear Spray w/Hip Holster #18HP - 13.4oz - 380g - Bear Spray w/Hip Holster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations ASC - Aerosol safety case (small aircraft)

#18CP -13.4oz - 380g - Bear Spray w/Chest Holster

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay

Be Prepared in Bear Country
To Deter Bears from
Aggressive Attacks!



Works on All Bear Species

35 FOOT FOG!

#18 Bear Spray

power.

UDAP

Bear

Pepper Spray

Be Prepared!

Bear Attack



Hip Holster

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION

#12 - 7.9oz-225g - Bear Spray (can only)

#12HP - 7.9oz-225g - Bear Spray w/Hip Holster

#12CP - 7.9 oz-225g - Bear Spray w/Chest Holster

#15 - 9.2 oz-260g - Bear Spray (can only)

#15HP - 9.2 oz-260g - Bear Spray w/Hip Holster

#15CP - 9.2 oz-260g - Bear Spray w/Chest Holster

#18 - 13.4oz - 380g - Bear Spray (can only)

#18HP -13.4oz - 380g - Bear Spray w/Hip Holster

#18CP -13.4oz - 380g - Bear Spray w/Chest Halster

Bear Spray Accessories

GM - Geta Grip - for mounting bear spray to: bikes,
 ATV's, RV's, boats and security locations

ASC - Aerosol safety case (small aircraft)

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) Stay

Be Pr

To Deter Bears from Aggressive Attacks!



Works on All Bear Species

35 FOOT FOG!

Capsaicin & Related Capsaiciniods

Mark Matheny a grizzly bear attack survivor

> #18HP Bear Spray with Hip Holster

Fee for Service {883429E~

This package includes the following	for Division				
New Registration Amendment Studies? Fee Waiver? volpay Reduction:	○ AD ○ BPPD ○ RD Risk Mgr. 7				
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	883429 72007-1 10/6/2010				
This item is NOT subject t	o FFS action.				
Action Code: Requested: Granted: Amount Due: \$	Parent/Child Decisions:				
Inert Cleared for Intended Use	Uncleared Inert in Product				
Reviewer: loupkins	Date: 10- 7-10				
Remarks:					



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 7, 2010

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MARK MATHENY UDAP INDUSTRIES INC. 13160 YONDER ROAD BOZEMAN, MT 59718-

PRODUCT NAME: UDAP PEPPER POWER BEAR DETERRENT

COMPANY NAME: UDAP INDUSTRIES INC.

OPP IDENTIFICATION NUMBER:

EPA FILE SYMBOL: 72007-1 EPA RECEIPT DATE: 10/06/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 308-6249.

Sincerely,

P.4. Throw
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature:	3.411
0 0	

11 g 1	Check List Item	Y	es	No	, NP
1	Application Form (EPA Form 8570-1) -signed?	X	1		
	C Cl 4 104 Avenue & FE-mails (CDA Forms 9570 20) signed?		1		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	-	1		N
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?				P
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?	1			lo de
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses] a) Selective Method?				X
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay				
1	c) Public copy of Matrix provided? See PR Notice 98-5				
5	Is Label Included? (5 copies)	× ×			,
1	Comments:				
	Spreading label around		4		
	Hu branch (per Meredith). Realize that this is not				

UDAP Industries Inc. EPA Registration Number 72007-1 Amendment to Package labeling

September 29, 2010

Daniel B. Peacock, Biologist
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

RE: UDAP Pepper Power Bear Deterrent EPA Registration Number 72007-1

Application for an amendment to add package labeling

Dear Mr. Peacock:

UDAP Industries Inc. with this letter submits an application for the following amendment to the above registered product. The amendment is to add package labeling to the product line UDAP Pepper Power Bear Deterrent.

UDAP Industries Inc. wishes to register additional package labeling on insert cards of the brand UDAP Pepper Power Bear Deterrent EPA Reg. No. 72007-1.

- 1. UDAP wishes to market a 2 pack of bear spray. The wording on the existing labels will not change but we would like to add the words "Bear Spray 2 Pack" to the front of the insert card for the package. Because the canisters will be package next to each other in the plastic clamshell UDAP will add the two Panels of labeling to the back of the insert card. We already provide the "Directions For Use" panel on our product inserts but for this application will add the "Precautionary Statements" as well. No wording will differ from the label for these sections. UDAP Industries, Inc. will provide a sample insert card for labeling of the proposed combo pack (See Appendix A).
- 2. UDAP wishes to market our largest canister 13.4oz in a clamshell package too. The wording will not vary from the current registration. UDAP will print both the "Directions For Use" and "Precautionary Statements" on the back of the insert card so the consumer can clearly read the entire label. UDAP Industries Inc. will provide a sample insert card for labeling of the proposed combo pack (See Appendix B).

Please Note: The layout may change a bit on the clamshell once we receive the actual unit. This is our best estimate to how the layout should go. Also we may change the pictures of the bears to similar images, but wording will not change. We understand that we cannot include a graphic that misleads the product.

In suppo	rt of the Amendment, enclosed you will find the following:		:
1.)	Two Applications (EPA Form 8570-1).		
2.)	Two Copies of this letter attached to the applications		
3.)	Five Copies of the insert card for new proposed Bear Spray 2 pack (See App	eridik A).	
4.) Sincerely	Five Copies of the insert card for the 13.4oz/380g size (See Appendix B).	•	
	h General Manager dustries, Inc.		
3160 Yo	nder Road, Bozeman MT 59718		
406-494-	9292 - TimL@UDAP.com		

Please read instructions on reverse before completing form.

Print Form Form Approved. OMB No. 2070-0060, Approval expires 2-28-

2		1
-		
-	-	

United States

	Registration
X	Amendment
	Other

OPP Identifier Number

\$EPA	Environmental Washin	Protection ngton, DC 20460	Agency	×	Amenda Other	nent		
		Application	for Pesticide -	Section	1			
1. Company/Product Number 72007-1	or .		2. EPA Produc Dan Peacock	t Manager		-	oposed Classification	
4. Company/Product (Name) UDAP Pepper Power Bear Deterrent			PM#]	
5. Name and Address of Ap UDAP Industries, Inc. 13160 Yonder Road Bozeman, MT 59718	plicant (Include ZIP Co.	de)	The second secon	duct is sin 72007- 10	nilar or identi	cal in co	FIFRA Section 3(c)(3) mposition and labeling Deterrent	
			Section - II					
Resubmission in results Resubmission in results Resubmission in results Resubmission in results Resubmission - Explain Explanation: Use addition UDAP Pepper Power Beau Application for an amen	ponse to Agency letter below. nal page(s) if necessar	y. (For section I cristration # 7200	Agen- "Me 7 Other	cy letter da Too* Applic - Explain t	eation.			
(Please see attached Let			Section - III					
1. Material This Product Wi		- 1.	Water Soluble Packagii	e a	1			
Child-Resistant Packaging Yes X Yes No * Certification must be submitted Unit Packaging X Yes No. per Unit Packaging wgt.		No. per	Yes Text If "Yes" No. per		2. Type of (Metal	ipecify)	
3. Location of Net Contents	Information	4. Size(s) Retail	etail Container 5. Loca			ation of Label Directions		
	Container		a) Hotali Containol		On Label	aning product		
6. Manner in Which Label is	Affixed to Product	Lithograp Paper glu Stenciled	h ed	Other				
			Section - IV					
1. Contact Point Complete	items directly below f	or identification o	f individual to be conta	acted, if ne	cessary, to pu	cess this	application.)	
Name Tim Lynch		Tit Ge	le eneral Manager			Telephon 406-494	e No. (Include Area Code) -9292	
	ements I have made on ny knowlinglly false or I law.		attachments thereto a				6. Date-Application Received	
2. Signature 3. Title		Title eneral Manager				•••••		
4. Typed Name Tim Lynch			Date eptember 29, 2010				161	

Fee for Service

₹883784Q~

This package includes the following	for Division
○ New Registration ○ Amendment □ Studies? □ Fee Waiver?	O AD O BPPD O RD Risk Mgr. 7
Polpay % Reduction: Receipt No. S-[EPA File Symbol/Reg. No.	883784 72007-1
Pin-Punch Date:	10/13/2010
This item is NOT subject to	FFS action.
Action Code:	Parent/Child Decisions:
Requested: Granted: Amount Due: \$	
	I neito mot approved - see status fors S. Rosh 10/10/10 Uncleared Inert in Product
Reviewer: Hope Johnson Remarks: PM - not sure if included now	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 14, 2010

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MARK MATHENY UDAP INDUSTRIES INC. 13160 YONDER ROAD BOZEMAN, MT 59718-

PRODUCT NAME: UDAP PEPPER POWER BEAR DETERRENT

COMPANY NAME: UDAP INDUSTRIES INC.

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 72007-1 EPA RECEIPT DATE: 10/13/10

SUBJECT: RECEIPT OF AMENDMENT

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If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 308-6249.

Sincerely,

Front End Processing Staff

Information Services Branch

Information Technology & Resources Management Division

FAST-TRACK AMENDMENTS-Completeness Screening Checklist Experts In-Processing Signature: M. WACS H

Application Form (EPA Form 8570-1) – sign Confidential Statement of Formula (EPA F Certification with Respect to Citation of Dasigned? Formulator's Exemption Statement (EPA F Data Matrix (EPA Form 8570-35) [Applicable	Form 8570-29) – signed?		<u> </u>
Certification with Respect to Citation of Dasigned? Formulator's Exemption Statement (EPA Formulator)	ata (EPA Form 8570-34)		<u> </u>
signed? 4 Formulator's Exemption Statement (EPA Formulator's Exemption Statement)		>	7
	orm 8570-27) - signed?		
5 Date Matrix (EDA Form 9570 25) [Amalianh]			X
a) Selective Method?	e, for adding me-too uses]	?	<u> </u>
b) Cite-All Method? Applicant owns data offered to pay	or list only the companies		
c) Public copy of Matrix provided? See P	R Notice 98-5		
Is Label Included? (5 copies)	×		
Comments: (ABEZ AMENDMEN	VT.		
* SEE NOTE TO	PM		



Item #GM Geta Grip mounts
Pepper Spray to: Bicycles (predrilled for water bottle mounts)
R.V.'s & Campers Boats, A.T.V.'s
& Other Security Locations!





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PRECAUTIONARY STATEMENTS

DANGER: May cause irreversible physical eye damage if sprayed in DANCER, May cause ineversible physical eye drainage if sprayed in he eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash ciathing before reuse.

FIRST ALD

Have label with you when obtaining treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15—20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment orbide.

treatment advice.

I FIN EYES. Hold eye open and rinse slowly and genity with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison contact center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

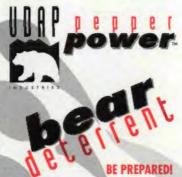
Contents under pressure. Do not use or store near beat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting. STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PEFS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hor vehicle or in

pills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

Il empty: Do not reuse empty container. Place in trash or offer for recycling if available. If par ally filled: Call your local solid waste agency for disposal instructions.

er: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power^{ia} use against bear attacks. Please call 1-800-232-7941 for details.



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong initiant to eyes, nose and skin. Wash thoroughly with soop and water after handling. See Side Panel for additional precautions.

in and related capsaid ids 2.0% Inert ingredients TOTAL *Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor! CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 9.2 ounces (260g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

its lobeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not sprey this product on tents, other objects, or on clothing. Such use has no deternent effect on bears. Keep safety dip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nase, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters).

This conister empires completely in approximately 4 seconds [225g container] 5.4 seconds [260g container].

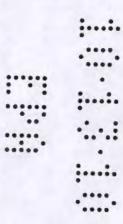
APPLICATION DIRECTIONS: Special procedures must be followed to arm The container, apply the product, and restore the safety dip to disorm the container, Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power* in an area where you plan to comp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean tish. Do not testhine for more than a half a second. After testhring, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

10 ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will express the integer lever. Denotes those lever with

hombing, but screen only up that straight book. This was expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attracking bear is changing toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain con greatly affect the occuracy of the initial burst of spray, in some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, climing for the foce. Shield your eyes and face if you must face the

wind. TO DISARM: Replace safety dip as illustrated (Fig. 3).





PRACTICE MAKES PERFECT SENSE!

If you have not used our products before, you should obtain this UDAP training can and practice with it until you can perform, quickly and accurately, the activities necessary to Arm, Apply and Disarm the product.

You may want to practice actually shooting from your holster with this inert can. The inert cans have the same spraying power as our regular sprays without the hot pepper. For training purposes only.

Bear Safety 1st

In a bear attack situation, we do know this: you will panic if you have not been trained ahead how you will think and react. Practice what you need to do in different attack situations. Rehearse, with friends or family various situations in order to be prepared in a real life threatening situation. Recently, a mother and her children were able to prevent a possible mauling by holding bear encounter drills with her family at home before hitting the trail.

UDAP Industries, Inc. Bozeman, MT 59718

www.PepperPower.com



INERT TRAINING UNIT

Contains no active irritant.
Practice use only.

WARNING

KEEP OUT OF REACH OF CHILDREN FLAMMABLE

IRRITANT. CONTENTS UNDER PRESSURE. Do not puncture or incinerate can. Exposure to heat about 120°F (50°C) may cause bursting. Caution: Always use eye protection when being sprayed with any Inert Training Unit.



Produced by a grizzly attack survivori

Net Contents: 9.2 ounces (260g)

DIRECTIONS

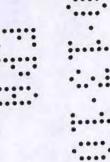
TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind. Be sure to aim low because of the billowing effect of the fog.

TO DISARM: Replace safety clip as illustrated (Fig. 3).









Active ingredient is an herbal extract. WARNING: For external use only. Keep out of eyes. Avoid exposure to contact lenses. Keep out of reach of children. CAUTION: Contents Under pressure. Do not expose to temperatures above 120°

#2RESQ Pepper Spray Relief



Raliavar

Effective relief from pepper spray

Chemical Agent **Decontamination Spray**

Net Wt. 1.6 oz.

Directions

Directions

1. Shake well prior to use.

2. Hold the unit upright approximately 12 inches from person. Spray liberally to all contaminated areas as soon as passible after exposure to chemical agent.

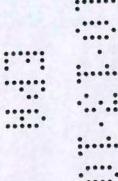
3. After 5 to 10 seconds, blot affected area with a clean cloth or paper towel. Do not rub.

4. Repeat steps 1-3 until relief is effected.

5. After recovery, flush

5. After recovery, flush contaminated areas with cool

UDAP Industries, Inc. Bozeman, MT 59718 www.PepperPower.com 1-800-232-7941





Aerosol Safety Case

Fits All EPA Registered Bear Spray Canisters

- Helps Protect against extreme temperatures! Resists Heat!
- Ideal for storage in vehicles or non-commercial aircraft.
- This is the recommended & approved Aerosol Safety Case by the U.S. Forest Service.

Produced by a grizzly bear attack survivor!



UDAP Industries P.O. Box 4872 Butte, MT 59702 (800)-232-7941

www.pepperpower.com







Tie in jachet 1

TELEPHONE MEMORANDUM

Date

March 18, 2010

Subject

UDAP Pepper Power Bear Deterrent

EPA Reg. No. 72007-1

Gina Storey's E-Mail of March 18, 2010

From

Daniel B. Peacock, Biolog

Insecticide-Rodenticide

To

Gina Storey

Background

UDAP has been considering a bear deterrent kit containing:

- 1. the bear deterrent,
- 2. a practice can,
- 3. a reliever can,
- 4. an Aerosol Safety Container, and
- 5. a bear spray mount.

On March 16, 2009, I had listed the information that UDAP needed for us to determine:

- 1. if the product would be a separate product and
- 2. if additional data would be required.

We need the following information about the components of your kit to determine if it should be a separate registration and if we will need additional data to support this request:

- 1. a CSF for the contents of your training can,
- 2. label for training can,
- 3. a CSF for the reliever,
- 4. label for reliever,
- 5. information on your Aerosol Safety Container for safe storage of bear spray,
- 6. label for Aerosol Safety Container, and
- 7. label for GetaGrip bear spray mount.

Status

On March 18, 2010, Ms. Storey provide a small portion of the information, but insufficient to answer Question 2 above.

3-18-2010 Message Answer #1

I told Ms. Storey that the bear deterrent kit would be a new product.

Answer #2

When she submits the information provided in my March 16, 2009, E-Mail, we would meet internally and decide what additional data or information would be required to consider a new bear deterrent product.

Memo location

Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\Capsaicin\72007\72007-1, Kit\Record of Telephone Call, Possible Kit, 3-18-2010.doc



Re: CSF Gina Storey@UDAP to: Dan Peacock Please respond to "Gina Storey @ UDAP"

03/18/2010 02:36 PM

```
relieur
>> Dan,
   The contents for the #15-T
>> The contents for the #2RESO
>> Do I need any thing else?
>> Thanks,
>>
>> Gina
>> ---- Original Message -----
>> From: <Peacock.Dan@epamail.epa.gov>
>> To: "Gina Storey @ UDAP" <gstorey@udap.com>
>> Sent: Monday, March 30, 2009 9:58 AM
>> Subject: Re: CSF
>>
>>
>>> Dear Ms. Storey,
>>> There would be 2 CSFs: 1) contents of practice can and 2) contents of
>>> recovery can.
>>>
>>> Thank You,
>>> Daniel B. Peacock, Biologist
>>> Tel: 703-305-5407
>>> Fax: 703-305-6920
>>> E-Mail: peacock.dan@epa.gov
>>> Addresses:
>>> United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
>>> Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
>>> Washington, DC 20460-0001
>>>
>>> Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
>>> Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
>>> VA 22202
>>>
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>>>
      From:
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>>> | "Gina Storey @ UDAP" <gstorey@udap.com> |
>>>
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>>> | ----->
    To:
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>>> |----->
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>>> Dan Peacock/DC/USEPA/US@EPA
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>>> |----->
>>> Date:
>>> |----->
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>>>
>>> |03/30/2009 12:21 PM |
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>>> |----->
>>> | Subject: |
>>> |----->
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>>> | CSF |
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>>> Dan,
```

>



Re: CSF Gina Storey@UDAP to: Dan Peacock Please respond to "Gina Storey@UDAP"

"Gina Storey @ UDAP" <gstorey@udap.com>

03/08/2010 03:02 PM

Dan,

>

The contents for the #15-I

The contents for the #2RESQ

```
Do I need any thing else?
```

```
Thanks,
Gina
---- Original Message -----
From: <Peacock.Dan@epamail.epa.gov>
To: "Gina Storey @ UDAP" <gstorey@udap.com>
Sent: Monday, March 30, 2009 9:58 AM
Subject: Re: CSF
> Dear Ms. Storey,
> There would be 2 CSFs: 1) contents of practice can and 2) contents of
> recovery can.
> Thank You,
> Daniel B. Peacock, Biologist
> Tel: 703-305-5407
> Fax: 703-305-6920
> E-Mail: peacock.dan@epa.gov
> Addresses:
> United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
> Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
> Washington, DC 20460-0001
> Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
> Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
> VA 22202
>
   From:
>
```

176



Re: CSF Gina Storey@UDAP to: Dan Peacock Please respond to "Gina Storey @ UDAP"

Thanks, Gina ---- Original Message -----From: <Peacock.Dan@epamail.epa.gov> To: "Gina Storey @ UDAP" <gstorey@udap.com> Sent: Monday, March 30, 2009 10:58 AM Subject: Re: CSF > Dear Ms. Storey, > There would be 2 CSFs: 1) contents of practice can and 2) contents of > recovery can. > Thank You, > Daniel B. Peacock, Biologist > Tel: 703-305-5407 > Fax: 703-305-6920 > E-Mail: peacock.dan@epa.gov > United States Postal Service (USPS): USEPA, Insecticide-Rodenticide > Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, > Washington, DC 20460-0001 > Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration > Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, > VA 22202 From: |"Gina Storey @ UDAP" <gstorey@udap.com> To: Dan Peacock/DC/USEPA/US@EPA

```
>
     Date:
 > |03/30/2009 12:21 PM
> |
    Subject:
 > | CSF
> |
 > Dan,
  > Is the CSF the content for the cans?
  > Thanks,
  > Gina
 > Gina Storey
 > Sales Manager
 > UDAP Industries Inc.
 > 1703 Waterline Road
 > Butte, MT 59701
 > PH: 406-494-9292
 > gstorey@udap.com
```

CFS
Gina Storey@UDAP
to:
Dan Peacock
03/18/2009 11:09 AM
Please respond to "Gina Storey @ UDAP"
Show Details

Dan,

What does CFS stand for?

Gina

Gina Storey
Sales Manager
UDAP Industries Inc.
1703 Waterline Road
Butte, MT 59701
PH: 406-494-9292
gstorey@udap.com





Re: 72007-1, Amendment, Add Labeling for a Bear Spray Kit for Sale in Retail Stores Gina Storey@UDAP

to:

Dan Peacock

03/17/2009 04:51 PM

Please respond to "Gina Storey @ UDAP" Show Details

Dan.

I will get you the information asap.

Thanks,

Gina

---- Original Message -----

From: Peacock.Dan@epamail.epa.gov

To: gstorey@udap.com

Sent: Monday, March 16, 2009 1:32 PM

Subject: 72007-1, Amendment, Add Labeling for a Bear Spray Kit for Sale in Retail Stores

Dear Ms. Storey,

- . We are reviewing your request to add labeling for a Bear Spray Kit for Sale in Retail Stores.
- . This is the first time that we have had a request for such a kit.
- We need the following information about the components of your kit to determine if it should be a separate registration and if we will need additional data to support this request:
- 1. a CSF for the contents of your training can
- 2. label for training can
- 3. a CSF for the reliever
- 4. label for reliever,
- 5. information on your Aerosol Safety Container for safe storage of bear spray
- 6. label for Aerosol Safety Container
- 7. label for GetaGrip bear spray mount
- 8. Thank You,
- · Let me know if you have any questions about this request.

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-305-6920

E-Mail: peacock.dan@epa.gov

Addresses

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

UDAP Industries Inc. 13160 Yonder Road Bozeman, MT 59718 406-494-9292

December 8, 2008 EPA Registration Number 72007-1

Daniel B. Peacock, Biologist Insecticide, Rodenticide Branch Registration Division (7504C) Office of Pesticide Programs, EPA

RE: UDAP Pepper Power Bear Deterrent
EPA Registration Number 72007-1
Application for an amendment to approve labeling for a Bear Spray Kit for sale in retails stores.

Dear Mr. Peacock,

UDAP Industries Inc. with this letter submits an application amendment for a new label request for the above registered product. The amendment is to add a new label for a Bear Spray Kit to be sold in retails stores. This labeling is an addition to UDAP labeling already on file with the EPA.

UDAP Industries Inc. wishes to add a new label for our Bear Spray kit to the UDAP Pepper Power Bear Deterrent EPA Reg. No. 72007-1. This Bear Spray Kit will include our a bear spray with holster, along with these accessories:

- inert bear spray canister (which contains no active ingredients) for training purposes,
- Aerosol Safety Container for safe storage of bear spray,
- GetaGrip bear spray mount for bicycles and other areas bear spray may be needed such as a zoo
- 4. Decontamination Spray in case of accidental discharge of bear deterrent
- UDAP Bear Safety Tip Booklet (already and EPA approved labeling for this registration) for safety precautions.

Please note not all accessories will be included in each kit. Different combinations may be used. The labeling will reflect only those Items included. UDAP Industries, Inc. feels that the public can benefit from these kits. Each accessory enhances the safety for the entire user. Each bear spray kit will have a complete EPA approved bear spray canister label on the box. The main panel will direct the consumer to this label for more information.

UDAP Industries Inc. will provide a label of the proposed size (See Appendix A) that we would like to place on the box of each kit.

In Support of the Amendment, enclosed you will find the following:

- 1.) Two Applications (EPA Form 8570-1).
- 2.) Two copies of this letter attached to the application.
- 3.) Five copies of the labels we will be placing on outside of box (See Appendix A).

Sincerely,

Gina Storey

Sales Manager

UDAP Industries Inc.

Email: Faxes@udap.com



Environmental Protection Agency Washington, DC 20460

Registration						
×	Amendment					
	Other					

OPP Identifier Number

*		War at a facility	2	Other			1	
7	A	pplication for	Pesticide - Sect					
1. Company/Product Number 72007-1			2. EPA Product Manager Dan Peacock		3. Proposed Classification			
4. Company/Product (Name) UDAP Pepper Power Bear Deterrent			PM#		ione	Restricted		
5. Name and Address of App UDAP Pepper Power Bea 13160 Yonder Road Bozeman, MT 59718		·/	6. Expedited Revi (b)(i), my product is to: EPA Reg. No. 72	similar or identi 2007-1	cal in com	position	and labeling	
		Sec	tion - II					
Resubmission in resp Notification - Explain Explanation: Use addition UDAP Pepper Power Bear Application for amendment	below. al page(s) if necessary. Deterrent EPA Regis	(For section I and S	Agency lette "Me Too" A Other - Expl action (I.)	pplication. ain below.	to	4.04		
1. Material This Product Wil	Re Packaged In:	Sec	tion - III					
Child-Resistant Packaging Yes* No Certification must be submitted	Id-Resistant Packaging Yes No Certification must Unit Packaging Yes No. per Unit Packaging wgt. containe		Water Soluble Packaging Yes No If "Yes" Package wgt No. per Container		2. Type of Container Metal Plastic Glass Paper Other (Specify)			
3. Location of Net Contents Information 4. Size(s) I			ontainer 5. Location of Label Direction On Label On Labeling accom				product	
6. Manner in Which Label is	Affixed to Product	Lithograph Paper glued Stenciled	Othe					
		Sec	tion - IV					
Contact Point <i>(Complete items directly below for identifica</i> Name Gina Storey			of individual to be contacted, if necessary, to printe Title Cales Manager			Telephone No. (Include Area Code) 406-494-9292		
	oments I have made on many knowingly false or many					Rece	Application lved Stamped)	
2. Signature	3. Title Sales N	Manager						
4. Typed Name Gina Storey			5. Date Nov 24, 2008			-		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

300 5.818600 1165

October 18, 2007

UDAP Industries, Inc. 13160 Yonder Road Bozeman, MT 59718

Attention: Ms. Mark Matheny

Subject **UDAP Pepper Power Deterrent**

EPA Reg. No. 72007-1

Your resubmission of October 8, 2007

Purpose The submission revises the labeling for this product, under sec 3 of the

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Review The revisions to your labeling text are acceptable. Make sure that all text

> meets the minimum type size requirements. See Enclosure 2 and the type size on accepted labeling. The new background color (light orange) is

acceptable.

Labeling The labeling submitted with the above letter is acceptable. We have

enclosed a copy of the approved labeling.

Existing Stocks of product with existing labeling may be used for eighteen (18)

Stocks months.

Consequence If this condition is not complied with, the registration will be subject to

for noncancellation in accordance with FIFRA section 6(e). Your release for compliance

shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C)

Enclosures

1. Stamped label

2. Type Size Requirements for Final Printed Labels

File Location Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Capsaicin\72007\72007-1, revise graphics, text - background, 10-18-2007.doc

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soop and water ofter handling. Remove contaminated clothing and wash clothing before reuse.

Have label with you when obtaining treatment advice IF ON SKIM OR CLOTHING Take off contemporated clothing. Rinse skin immediately with alenty of water for 15-20 minutes. Call a paison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EVES: Hold eve open and rinse slowly and cently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue ripsing eye. Call a paison control center doctor or 1-800-858-7378 immediately for treatment odvice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. No not store in hat vehicle of in direct suring

Solls: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

il empty. Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled. Call your local solid waste agency for disposal instructions.

Discharmer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local low enforcement officials about regulations concerning this product. Note: As part of an angoing research project, UDAP Industries needs your true account of UDAP Pepper Power" use against bear attacks. Please call 1-800-232-7941 for



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precoutions.

Active ingredients:

Consolein and related consoleinolds* 2.0% Inert ingredients TOTAL

98.0% 100.0%

"Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor!

CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 7.9 ounces (225g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter begrs which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This and active may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no beterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lunas, individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters).

This conister emoties completely in approximately 4 seconds [225g container] 5.4 seconds [260a container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety dip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power" in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nazzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it

until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

TO DISARM: Reolace safety clip as illustrated (Fig. 3).



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eve damage if sprayed in the eve. Contact through touching or rubbing eves may result in substantial but temporary eve injury. Avaid contact with skin or clothing. Wash thoroughly with soop and water after handling. Remove contominated clothing and wash clothing before reuse.

Have label with you when obtaining treatment advice # ON SKIN OR COTTONS: Take off contaminated clothing. Rinse skin immediately with pleaty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice

IF IN EYES. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Coll a poison control center, doctor, or 1-800-858-7378 immediately for treatment odvice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use ar store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do get stop in hot wehrele or an direct suplight

Smills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available, if partially filled. Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power use against begr attacks. Please call 1-800-232-7941 for details.



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LARFI LIPON PURCHASE & REFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soop and water after handling. See Side Panel for additional precautions.

> Active Ingredients: Capsaicin and related capsaicinaids 2.0% Inert ingredients 98.0% 100.0%

> > *Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor!

CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001

Net Contents: 9.2 ounces (260a)

DIRECTIONS FOR USE

It is a violation of Federal low to use this product in a manner inconsistent with its labelina.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with coution. Contents will cause agin and temporary impairment to eyes mose mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters).

This conister empties completely in approximately 4 seconds [225g container] 5.4 seconds [260g container].

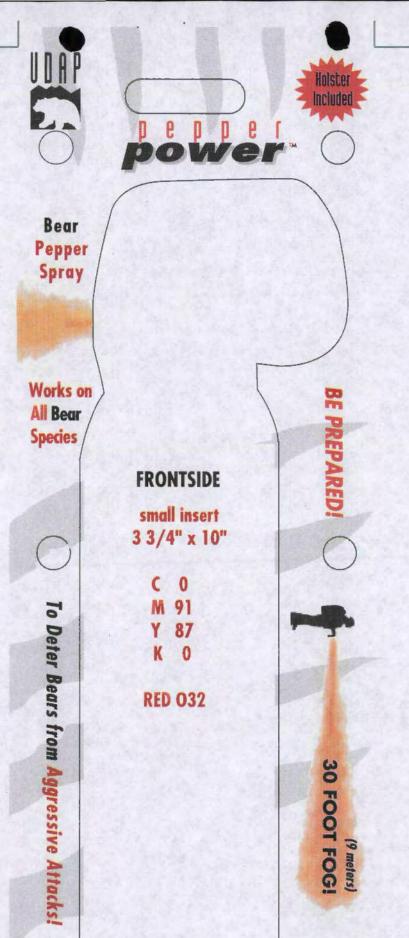
APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power^{IM} in an area where you plan to comp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with spap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY. Place forefinger through loop in handle with thumb on curl of safety dip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind.

TO DISARM: Replace safety dip as illustrated (Fig. 3).



Fig. 3









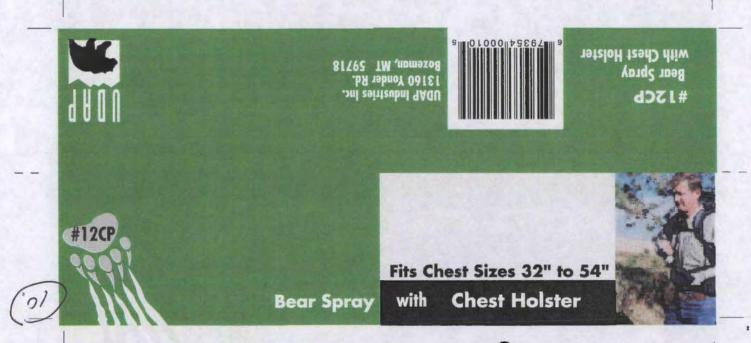






color -Red 032
7% Screen

BASE 12CP-681 SIZE 3" x 6.75 score







Appendix C page 1

Advertising claims for UDAP Industries Inc. Pepper Power Bear Deterrent

- 1. 2Q outside curl, internally lined, seamless aluminum can
- 2. Affects eyes, nose and throat rapidly
- 3. All Holsters designed for rapid removal
- 4. Bear spray works
- Crosses over Canada border (See Appendix C Page 2 for information regarding this claim)
- 6. Deters bears from aggressive attacks
- 7. Effective range up to 30 feet
- 8. Each batch is coded and has an expiration date of three years
- 9. Fog pattern (presented with illustration)
- 10. High-emission, fire-extinguisher style spray pattern
- 11. Highly visible spray
- 12. Large rectangular nozzle
- 13. Mark Matheny, President UDAP Industries, a grizzly attack survivor
- 14. Successful in many bear attacks
- 15. Established by a Grizzly Attack Survivor
- 16. Spray'em don't slay'em
- 17. UDAP Bear spray works
- 18. We are dedicated to helping safeguard people from attacks and to help co-exist with our wildlife.

PRECAUTIONARY STATEMENTS

HAZARDS TO SHIMANS & DOMESTIC ANIMALS

BANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

BRST AID

Have label with you when obtaining treatment advice
IF ON SKIN OR CLOTHING. Take off contaminated clothing. Rinse
skin immediately with plenty of water for 15-20 minutes. Call a
poison control center, doctor, or 1-800-858-7378 immediately for

treatment advice.

IE IN DYS. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Coll a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

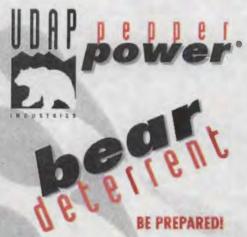
STORAGE STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store as not vehicle or in direct support

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY.

DISPOSAL- DO NOT INCINERATE OR PUNCTURE

If ampty. Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled. Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for domage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement afficials about regulations concerning this product. Note: As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for details.



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A
BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME
UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE
EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ
CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS
PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nase and skin. Wash thoroughly with soop and water after handling. See Side Panel for additional precautions.

Active Ingradients: Capsaicia and related capsaicinoids 2.0%

Inert ingredients 98.0%

*Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor!

CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 13.4 ounces (380g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on dothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with cause pain and temporary impoirment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size].

This product has a range of up to 30 feet [260g, 225g size].

This canister emplies completely in approximately 7 seconds [380g container],

5.4 seconds [260g container], 4 seconds [225g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power* in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP training can

product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below. TO ARM AND APPLY Place foreinger through loop in handle with thumb on cut of safety clip [Fig. 1]. With thumb, pull safety clip up and stroight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray [Fig. 2]. This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or roin can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite clase before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind.



TO DISARM Replace safety clip as illustrated (Fig. 3).

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or dothing. Wash thoroughly with soop and water after handling. Remove contominated dothing and wash dothing before reuse.

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment odvice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of wrused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in direct sunlight. Spills: Coll 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local low enforcement officials about regulations concerning this product. Move: As part of an angoing research project, UDAP Industries needs your true account of UDAP PepperPowerTM use against bear attacks. Please call 1-800-232-7941 for details.

UDAP Pepper Power Bear Deterrent



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

> Active Ingredients: Capsaicin and related capsaicinoids* 2.0% Inert ingredients 98.0% TOTAL 100.0%

*Made from Oleoresin of Capsicum

D & D D & I w UDAP Industries, Inc. P.O. Box 10808 1-800-232-7941 Bozeman, MT 59719

CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 7.9 ounces (225g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or gopear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or an clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters). This conister empties completely in approximately 4 seconds [225g container] 5.4 seconds

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire

PepperPower^{TAM} in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety dip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can creatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the

initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind, TO DISARM Replace safety dia as illustrated (Fig. 3).











Bear Pepper Spray

Appendix B Page 3

Works on All Bear Species







CHEST HOLSTER DIRECTIONS:

Hold chest holster upright, facing away from the body at chest level. Unbuckle bottom strap. Put left arm and head through top strap and place strap on shoulder. Wrap bottom strap around midsection and reattach buckle. Adjust straps to desired fit.

UDAP Bear Defense Products

#12 - 7.9 oz-225g - Bear Spray (can only)
#12HP - 7.9 oz-225g - Bear Spray w/kip Holster
#12CP - 7.9 oz-225g - Bear Spray w/kest Holster
#15 - 9.2 oz-260g - Bear Spray (can only)
#15HP - 9.2 oz-260g - Bear Spray w/kip Holster
#15CP - 9.2 oz-260g - Bear Spray w/kip Holster
#15CP - 9.2 oz-260g - Bear Spray w/kest Holster

Bear Spray Accessories

GM Geta Grip - for mounting bear spray to: bikes,
ATV's, RV's, boats and security locations
12ASC Pro-Tech - Aerosol safety case (small aircraft) 1
15ASC Pro-Tech - Aerosol safety case (small aircraft) 1
ALLBG Grizzly Grip - Clamp-on Bracket for Hiking Poles 1

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation.

Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327) 196 glert

Bear Attack

Be Prepared in Bear Country







Do NOT store in Hot vehicle or in direct sunlight Read Carefully the entire label upon purchase

UDAP'S HOLSTERS

Hip Holster



Appendix B

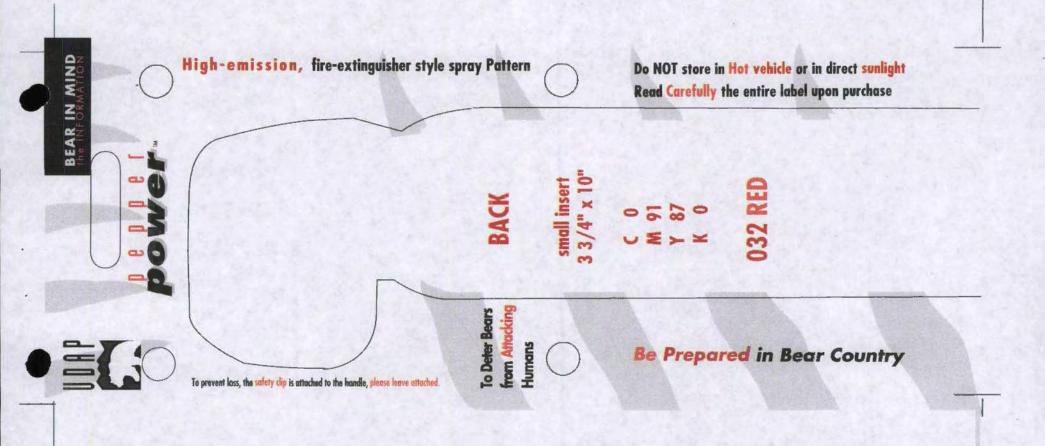
Page 4

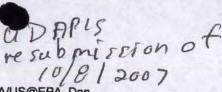
(9 meters)

30 FOOT FOG!

For use on All Bear Species

197







"Tim @ UDAP Pepper Power" <timl@udap.com>

10/08/2007 10:49 AM

Please respond to "Tim @ UDAP Pepper Power" <timl@udap.com> To Dan Peacock/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA

CC

pcc

Subject UDAP LABELING

Here is the labeling for the amendment. I sent you an example label 2nd day air. You should receive it today.

Thank You!

Tim Lynch | General Manager | UDAP Industries Inc. | PH: 406-763-4242 | FAX: 406-763-5052 |

TimL@udap.com Back small Insert 3.75x9.96 copy.pdf Front small Insert 3.75x9.96 copy.pdf Large back Insert 11-15-03 copy.pdf

Large Front Insert 11-15-03 copy.pdf New Pepper Power 225g Label for Automatic Labeler copy.pdf

Pepper Power 380g Label for Automatic Labeler copy.pdf 8.2 ounces (260g) for Automatic Labeler copy.pdf

12 &15 base can only copy.pdf 12HP S Green -Holster copy.pdf 15CP & 12CP Base 2005.pdf 15HP base 032 new holster.pdf

uDAP resubmission of Mul 2007



"UDAP Pepper Power" <timl@udap.com>

07/11/2007 06:58 PM

Please respond to "UDAP Pepper Power" <timl@udap.com> To Dan Peacock/DC/USEPA/US@EPA

C

bcc

Subject Re: 72007-1, Review of Alternate Graphics and Label Color

History:

This message has been forwarded.

Mr. Peacock.

5-818599

We have received your review of our alternate label. We will address the concerns of the EPA accordingly.

- 1.. UDAP Industries Inc. is already on the label in the address but to make it clearer we added it to the top of the canister label.
 - 2.. We corrected the ingredient statement.
- 3.. This particular label will not have any attached labeling. It will be sold in a clear poly bag.
- 4.. We understand that the EPA would like us to select a different Text/Background combination for our alternate label. On the other hand, we are certain a person with normal vision can easy read the label. We also believe that the topic headings such as first aid and the emergency number are easier to locate by the contrasting text colors. The reasons UDAP Industries Inc. is using the orange background are that the canister can be easily located in dire situations, and that it is a safety color that goes well with a safety product. The color orange has always been used for safety, especially in the sporting goods industry in which this product is mainly sold. Therefore the consumer can recognize this product as a safety product. UDAP Industries Inc. can supply a label with more contrast for the EPA to "image" to their website. We understand that the EPA wants it legible. As far as the actual products for the consumer we believe the label meets the requirements of FIFRA, and that there is sufficient contrast between the background and text. I will also note that the label will be even clearer when printed professionally for the consumer.

I have attached to this email a corrected version of the submitted label and also a label that will allow the EPA to "image" the label to their website.

Sincerely,

Tim Lynch UDAP Industries Inc. ---- Original Message ----

```
From: <Peacock.Dan@epamail.epa.gov>
To: <timl@udap.com>
Sent: Wednesday, July 11, 2007 7:11 AM
Subject: 72007-1, Review of Alternate Graphics and Label Color
> Mark Matheny,
   Attached is a PDF of my review.
   We can discuss the amendment further to find something acceptable to
   both you and EPA.
> (See attached file: 72007-1, rev graphic, label color, 7-11-2007.pdf)
> Thank You,
> Daniel B. Peacock, Biologist
> Tel: 703-305-5407
> Fax: 703-305-6920
> E-Mail: peacock.dan@epa.gov
> Addresses:
> United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
> Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
> Washington, DC 20460-0001
> Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
> Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
> VA 22202
```

Pepper Power 225g Orange revised from EPA letter dated July 11 2007.pdf Pepper Power 225g black bg for EPA web Imaging.pdf



Dan Peacock/DC/USEPA/US 07/11/2007 09:11 AM

To timl@udap.com

CC

bcc

Subject 72007-1, Review of Alternate Graphics and Label Color

Mark Matheny,

· Attached is a PDF of my review.

. We can discuss the amendment further to find something acceptable to both you and EPA



72007-1, rev graphic, label color, 7-11-2007.pdf

Thank You,

Daniel B. Peacock, Biologist

Tel: 703-305-5407 Fax: 703-305-6920

E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

72007-1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

July 11, 2007 E-Mail

300 5-810496

UDAP Industries, Inc. 13160 Yonder Road Bozeman, MT 59718

Attention: Ms. Mark Matheny

Subject: UDAP Pepper Power Deterrent

EPA Reg. No. 72007-1

Your letter of April 10, 2007

Purpose The purpose of this submission is to request approval of an alternate

graphic design and text/background combination for the label of this product, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Your submission said that neither the

product name nor text would change.

Alternate The alternate graphic of a bear on your can label and the words surrounding it. "Works on All Bear Species" and "To Deter Bear Speci

surrounding it, "Works on All Bear Species" and "To Deter Bears from Attacking Humans" are acceptable. Do those words also appear on the

can label of your basic label?

Labeling

Make the following changes to your proposed label and submit three (3) copies of revised labels with the following changes for your review.

 If you wish "UDAP Pepper Power Deterrent" to remain the name of this product, the same name must appear on the proposed alternate version of the label. The proposed alternate version omitted "UDAP" on the label.

Labelingcontinued

- 2. In the Ingredient Statement, both terms ("Active Ingredients" "Inert Ingredients" need to be "... the same type size, be aligned to the same margin and be equally prominent." [40 CFR 156.10(g).
- 3. You need to submit three (3) copies of the <u>complete</u> labeling, not just the can label.
- 4. Select a different text/background combination for your alternate label to provide better legibility. In addition to assuring that the label is easily readable in the market, we have to image the accepted label and post it on the internet. As you can see, the text/background combination that you have proposed does not image well.

We would be happy to work with you in this effort to find a combination that is easy to read, image, and market. See the enclosure, "Labeling Regulations on the Prominence and Legibility of Labeling, 40 CFR 156.10(a)(2)".

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C)

anil B Peacock

Enclosures

- 1. Labeling Regulations on the Prominence and Legibility of Labeling, 40 CFR 156.10(a)(2)
- 2. Imaged Proposed Label, EPA Reg. No. 72007-1

Letter Location Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Capsaicin\72007\72007-1, revise graphics, text - bacground, 7-11-2007.doc

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER. May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice

IF ON SKIN OR CLOTHING: Take off contaminated dothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF III EYES. Hold eve open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye, Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. No not store in hot

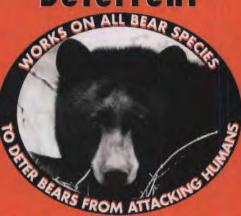
Stilles Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If annity Do not reuse empty container. Place in trash or offer for recycling if available. If garnally filled. Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact . local law enforcement officials about regulations concerning this product. Main: As Burt of an angoing research project, UDAP Industries needs your true account of UDAP Pepper Power use against bear affacks.

Please call 1-800-232-7941 for details

Bear Deterrent



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

Active Ingredients:

Capsuicin and related capsuicinoids 2.0% 98.0% Inert ingredients

TOTAL

100.0%

Made from Oleoresin of Consicum

power

UDAP Industries, Inc. P.O. Box 10808 1-800-232-7941 Bozeman, MT 59719

CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 7.9 ounces (225g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety dip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and longs, Individuals who suffer from asthma or employeema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters).

This conister empties completely in approximately 4 seconds [225g container] 5.4 seconds [260g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power" in an area where you plan to comp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean

nazzle and can with soop and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in

the column below. TO ARM AND APPLY Place forefinger through loop in handle with thumb on curl of safety dip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some coses, you may have to wait until the bear is quite close

before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind.

TO DISARM: Replace safety clip as illustrated (Fig. 3).

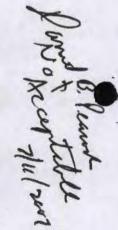


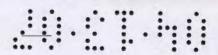












PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

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If emply: Do not reuse empty container, Place in trash or offer for recycling it available. It partially tilled: Call your local solid waste mency for disposal instructions.

Disclarator: To the extent allowed by law, UDAP industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including darth arising out of the use of, or inability to use this product. Contact local law progression officials about regulations concerning this product. Meta: As your of an ongoing research project, UDAP Industries needs your true account of UDAP Popper Pawer" use against bear attacks.

Please call 1-800-232-7941 for details.

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TO DISARM: Replace safety dip

as illustrated (Fig. 3).





156.212 Personal protective equipment statements.

AUTHORITY: 7 U.S.C. 136-136y.

Subpart A—General Provisions

§156.10 Labeling requirements.

(a) General—(1) Contents of the label. Every pesticide products shall bear a label containing the information specified by the Act and the regulations in this part. The contents of a label must show clearly and prominently the fol-

lowing:
(i) The name, brand, or trademark
(ii) The name, brand, or trademark scribed in paragraph (b) of this section;

(ii) The name and address of the producer, registrant, or person for whom produced as prescribed in paragraph (c) of this section;

(iii) The net contents as prescribed in

paragraph (d) of this section;

(iv) The product registration number as prescribed in paragraph (e) of this section:

(v) The producing establishment number as prescribed in paragraph (f) of this section;

(vi) An ingredient statement as prescribed in paragraph (g) of this section;

(vii) Hazard and precautionary statements as prescribed in subpart D of this part for human and domestic animal hazards and subpart E of this part for environmental hazards.

(viii) The directions for use as prescribed in paragraph (i) of this section;

(ix) The use classification(s) as prescribed in paragraph (j) of this section.

(2) Prominence and legibility. (i) All words, statements, graphic representations, designs or other information required on the labeling by the Act or the regulations in this part must be clearly legible to a person with normal vision, and must be placed with such conspicuousness (as compared with other words, statements, designs, or graphic matter on the labeling) and expressed in such terms as to render it likely to be read and understood by the ordinary individual under customary conditions of purchase and use.

(ii) All required label text must: (A) Be set in 6-point or larger type;

(B) Appear on a clear contrasting background; and

(C) Not be obscured or crowded.

(3) Language to be used. All required label or labeling text shall appear in the English language. However, the Agency may require or the applicant may propose additional text in other languages as is considered necessary to protect the public. When additional text in another language is necessary. all labeling requirements will be applied equally to both the English and other-language versions of the label-

ing Placement of Label-(i) General. The label shall appear on or be securely attached to the immediate container of the pesticide product. For purposes of this section, and the misbranding provisions of the Act, "securely attached" shall mean that a label can reasonably be expected to remain affixed during the foreseeable conditions and period of use. If the immediate container is enclosed within a wrapper or outside container through which the label cannot be clearly read, the label must also be securely attached to such outside wrapper or container, if it is a part of the package as customarily distributed

or sold.

(ii) Tank cars and other bulk containers-(A) Transportation. While a pesticide product is in transit, the appropriate provisions of 49 CFR parts 170-189, concerning the transportation of hazardous materials, and specifically those provisions concerning the labeling, marking and placarding of hazardous materials and the vehicles carrying them, define the basic Federal requirements. In addition, when any registered pesticide product is transported in a tank car, tank truck or other mobile or portable bulk container, a copy of the accepted label must be attached to the shipping papers, and left with the consignee at the

time of delivery.
(B) Storage. When pesticide products are stored in bulk containers, whether mobile or stationary, which remain in the custody of the user, a copy of the label of labeling, including all appro-priate directions for use, shall be securely attached to the container in the immediate vicinity of the discharge

control valve.

(5) False or misleading statements. Pursuant to section 2(q)(1)(A) of the Act, a

pesticide or a device declared subject to the Act pursuant to §152.500, is misbranded if its labeling is false or misleading in any particular including both pesticidal and non-pesticidal claims. Examples of statements or representations in the labeling which constitute misbranding include:

 (i) A false or misleading statement concerning the composition of the

product;

 (ii) A false or misleading statement concerning the effectiveness of the product as a pesticide or device;

(iii) A false or misleading statement about the value of the product for purposes other than as a pesticide or device;

(iv) A false or misleading comparison with other pesticides or devices;

 (v) Any statement directly or indirectly implying that the pesticide or device is recommended or endorsed by any agency of the Federal Government;

(vi) The name of a pesticide which contains two or more principal active ingredients if the name suggests one or more but not all such principal active ingredients even though the names of the other ingredients are stated elsewhere in the labeling;

(vii) A true statement used in such a way as to give a false or misleading im-

pression to the purchaser;

(viii) Label disclaimers which negate or detract from labeling statements required under the Act and these regulations;

(ix) Claims as to the safety of the pesticide or its ingredients, including statements such as "safe." "nonpoisonous," "noninjurious," "harmless" or "nontoxic to humans and pets" with or without such a qualifying phrase as "when used as directed"; and

(x) Non-numerical and/or comparative statements on the safety of the product, including but not limited to:

(A) "Contains all natural ingredients":

(B) "Among the least toxic chemicals known"

(C) "Pollution approved"

(6) Final printed labeling. (i) Except as provided in paragraph (a)(6)(ii) of this section, final printed labeling must be submitted and accepted prior to registration. However, final printed labeling need not be submitted until draft

label texts have been provisionally accepted by the Agency.

(ii) Clearly legible reproductions or photo reductions will be accepted for unusual labels such as those silkscreened directly onto glass or metal containers or large bag or drum labels. Such reproductions must be of microfilm reproduction quality.

(b) Name, brand, or trademark. (1) The name, brand, or trademark under which the pesticide product is sold shall appear on the front panel of the

label.

(2) No name, brand, or trademark may appear on the label which:

(i) Is false or misleading, or

(ii) Has not been approved by the Administrator through registration or supplemental registration as an additional name pursuant to § 152.132.

- (c) Name and address of producer, registrant, or person for whom produced. An unqualified name and address given on the label shall be considered as the name and address of the producer. If the registrant's name appears on the label and the registrant is not the producer, or if the name of the person for whom the pesticide was produced appears on the label, it must be qualified by appropriate wording such as "Packed for * * *," "Distributed by * * *," or "Sold by * * * " to show that the name is not that of the producer.
- (d) Net weight or measure of contents.
 (1) The net weight or measure of content shall be exclusive of wrappers or other materials and shall be the average content unless explicitly stated as a minimum quantity.

(2) If the pesticide is a liquid, the net content statement shall be in terms of liquid measure at 68 °F (20 °C) and shall be expressed in conventional American units of fluid ounces, pints, quarts, and gallons.

(3) If the pesticide is solid or semisolid, viscous or pressurized, or is a mixture of liquid and solid, the net content statement shall be in terms of weight expressed as avoirdupois pounds and ounces.

(4) In all cases, net content shall be stated in terms of the largest suitable units, *i.e.*, "1 pound 10 ounces" rather than "26 ounces."

(5) In addition to the required units specified, net content may be expressed in metric units.

(6) Variation above minimum content or around an average is permissible only to the extent that it represents deviation unavoidable in good manufacturing practice. Variation below a stated minimum is not permitted. In no case shall the average content of the packages in a shipment fall below

the stated average content.

(e) Product registration number. The registration number assigned to the pesticide product at the time of registration shall appear on the label, preceded by the phrase "EPA Registration No.," or the phrase "EPA Reg. No." The registration number shall be set in type of a size and style similar to other print on that part of the label on which it appears and shall run parallel to it. The registration number and the required identifying phrase shall not appear in such a manner as to suggest or imply recommendation or endorsement of the product by the Agency.

(f) Producing establishments registration number. The producing establishment registration number preceded by the phrase "EPA Est.", of the final es-tablishment at which the product was produced may appear in any suitable location on the label or immediate container. It must appear on the wrapper or outside container of the package if the EPA establishment registration number on the immediate container cannot be clearly read through such

wrapper or container.

(g) Ingredient statement—(1) General. The label of each pesticide product must bear a statement which contains the name and percentage by weight of each active ingredient, the total per-centage by weight of all inert ingredients; and if the pesticide contains arsenic in any form, a statement of the percentages of total and water-soluble arsenic calculated as elemental arsenic. The active ingredients must be designated by the term "active ingredients" and the inert ingredients by the term "inert ingredients," or the singular forms of these terms when appropriate. Both terms shall be in the same type size, be aligned to the same margin and be equally prominent. The statement "Inert Ingredients, none" is

not required for pesticides which contain 100 percent active ingredients. Unless the ingredient statement is a complete analysis of the pesticide, the term "analysis" shall not be used as a heading for the ingredient statement.

(2) Position of ingredient statement. (i) The ingredient statement is normally required on the front panel of the label. If there is an outside container or wrapper through which the ingredient statement cannot be clearly read, the ingredient statement must also appear on such outside container or wrapper. If the size or form of the package makes it impracticable to place the ingredient statement on the front panel of the label, permission may be granted for the ingredient statement to appear elsewhere.

(ii) The text of the ingredient statement must run parallel with other text on the panel on which it appears, and must be clearly distinguishable from and must not be placed in the body of other text.

- (3) Names to be used in ingredient statement. The name used for each ingredient shall be the accepted common name, if there is one, followed by the chemical name. The common name may be used alone only if it is well known. If no common name has been established, the chemical name alone shall be used. In no case will the use of a trademark or proprietary name be permitted unless such name has been accepted as a common name by the Administrator under the authority of section 25(c)(6)
- (4) Statements of percentages. The percentages of ingredients shall be stated in terms of weight-to-weight. The sum of percentages of the active and the inert ingredients shall be 100. Percentages shall not be expressed by a range of values such as "22-25%." If the uses of the pesticide product are expressed as weight of active ingredient per unit area, a statement of the weight of active ingredient per unit volume of the pesticide formulation shall also appear in the ingredient statement.

(5) Accuracy of stated percentages. The percentages given shall be as precise as possible reflecting good manufacturing practice. If there may be unavoidable variation between manufacturing

UDAP Industries Inc. EPA Registration Number 72007-1 Amendment to add a new graphic design

April 10, 2007

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C) Office of Pesticide Programs, EPA 4th Floor Mail Room 1 Potomac Yard 2777 Crystall Drive Arlington, VA 22202

UDAP Pepper Power Bear Deterrent

EPA Registration Number 72007-1

Application for an amendment to include a new graphic design.

Dear Mr. Peacock:

UDAP Industries Inc. with this letter submits an amendment for the registered product mentioned above. The amendment is to add a new graphic design to the product line **UDAP Pepper Power Bear Deterrent.**

UDAP Industries Inc. is submitting a label with new color and picture for the above registration to label. Absolutely no wording will change and the product will not be named anything different. We want to sell the spray with two different graphic designs.

Note: This amendment is not to replace the current label, but rather be presented along side of it. The registration in affect will have the same label, just with two color combinations.

In support of the Amendment, enclosed you will find the following:

Three Copies of the label with new proposed graphics. 1.)

Sincerely,

Mark Matheny President

UDAP Industries

210

UDAP Industries In.
EPA Registration Number 72007-1
Amendment to add a new size canister



March 29, 2007

Daniel B. Peacock, Biologist
Office of Pesticide Programs, EPA
4th Floor Mail Room
1 Potomac Yard
2777 Crystall Drive
Arlington, VA 22202

RE: UDAP Pepper Power Bear Deterrent

EPA Registration Number 72007-1

Amended Application of September 25, 2006

Dear Mr. Peacock:

UDAP Industries, Inc. with this letter submits (1) copy of final printed labeling with the requested changes from EPA letter dated March 5, 2007.

Sincerely,

Mark Matheny President UDAP Industries



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eve injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID
Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eve open and rinse slowly and pently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eve. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in

Spills: Coll 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste ngency for disposal instructions.

Disdaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. **Note:** As part of an ongoing research project JUAP Industries needs your true account of UDAP Pepper Power® use against bear attacks. Please call 1-800-232-7941 for



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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

Active Ingrodients: Capsaicin and related capsaicinoids* 2.0% Inert ingredients

TOTAL 100.0% *Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

Produced by a grizzly attack survivor! CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 13.4 ounces (380g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet [380g size]. This product has a range of up to 30 feet [260g, 225g size]. This conister empties completely in approximately 7 seconds [380g container], 5.4 seconds [260g container], 4 seconds [225g container],

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power* in an greg where you plan to camp, hunt, hike, or fish, Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until

you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety dip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the

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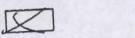


Date: 3-5-2017

NOTE TO SIG CONTRACTOR

This jacket [72007-/ contains, for imaging, a:

1) new stamped label or 2) new accepted CSF.



I have arranged & stapled papers with this action in reverse chronological order.

After processing, please insure that you staple papers with this action in the same order in which you received them.

Than you or your help.

Dan Peacock, 305-5407





OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

March 5, 2007

R-34 5-799960

UDAP Industries, Inc. 13160 Yonder Road Bozeman, MT 59718

Attention: Ms. Tim Lynch

Subject UDAP Pepper Power Bear Deterrent

EPA Reg. No. 72007-1

Your amended application of September 25, 2006

Purpose This submission adds an additional size of can (13.6 oz or 380 g) for this

product, in addition to the can sizes that we have already approved for this

product, under sec 3 of the Federal Insecticide, Fungicide, and

Rodenticide Act (FIFRA).

Review We have reviewed the spray pattern data (MRID No. 469516-01)

associated with this amendment and found them to be acceptable, with the

following comments:

The spray duration results reported for the 13.6 oz (380g)
container are consistent with a claim of "approximately 7
seconds". That is the longest spray duration claim that should be
considered based upon the data submitted.

 The effective spray distance for the 380g container are consistent with a claim of 35 feet, but these data only apply to this container. For the 225g and 260g containers, the claim of effective spray distance must remain at 30 feet.

Labeling

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling to us, with the following change, before you ship the product.

1. Modify the sentence explaining the expected range of the product as follows:

> This product has a range of up to 30 feet [225g, 260g size]. This product has a range of up to 35 feet [380g size].

The appropriate sentence would appear on the appropriate size of can.

- 2. Change "7.34 seconds" to "7 seconds".
- 3. On Appendix B, add the new container weight and make the same changes above.

Existing stocks **Forms**

Stocks of product with existing labels may be used for eighteen (18) months.

Consequence for noncompliance

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch

Daniel B. Peanh

Registration Division (7504C)

Attachment

Stamped Label

File Location Dan Peacock, Flash Drive, 1gb, K:\Capsaicin\72007\72007-1, add can

size, 2-27-2007.doc

Appendix A

Copy Of Proposed Label

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining treatment advice IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a

poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eve. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or in

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY. DISPOSAL: DO NOT INCINERATE OR PUNCTURE

If empty: Do not reuse empty container, Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. Note: As part of an ongoing research project. UDAP Industries needs your true occount of UDAP Pepper Power™ use against bear attacks. Please call 1-800-232-7941 for



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

Active Ingredients:

Capsaicin and related capsaicinoids* Inert ingredients

*Made from Oleoresin of Capsicum



UDAP Industries, Inc. P.O. Box 10808 Bozeman, MT 59719 1-800-232-7941

98.0%

100.0%

Produced by a grizzly attack survivor! CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001 Net Contents: 13.4 ounces (380g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has the deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet (11 meters).

This canister empties completely in approximately 4 seconds [225g container], 5.4 seconds [260g container], and 7.26 seconds [380g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power14 in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it

until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on curl of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming CCSPTE

the face. Shield your eyes and face if you must face the COMMENTS TO DISARM: Replace safety clip

as illustrated (Fig. 3).

in EPA Letter Dated

Under the Federal Insecticide. Fungicide, and Rodenticide Act as amended, for the pesticible registered under EPA Reg N.

72007-1





Holster Included

Bear Pepper Spray

Appendix B Page 1

Front

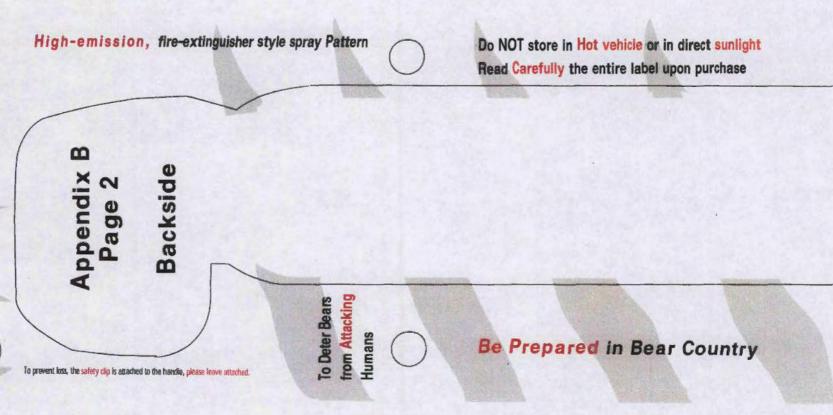
Works on All Bear/ Species/

BE PREPARED!

-9

(9 meters)
30 FOOT FOG!

To Deter Bears from Aggressive Attacks!



UDAP

Bear Pepper Spray

Appendix B Page 3

Works on **All Bear Species**

To Deter Bears from Aggressive Attacks!



For use on all Bear species

UDAP Bear Defense Products

ITEM# NET CONTENTS DESCRIPTION #12 - 7.9oz-225g - Bear Spray (can only) #12HP - 7.9oz-225g - Bear Spray w/Hip Holster #12CP - 7.9 oz-225g - Bear Spray w/Chest Holster #15 - 9.2 oz-260g - Bear Spray (can only) #15HP - 9.2 oz-260g - Bear Spray w/Hip Holster #150P - 9.2 oz-260g - Bear Spray w/Chest Holster

Bear Spray Accessories

GM Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations 12ASC Pro-Tech - Aerosol safety case (small aircraft) 1 15ASC Pro-Tech - Aerosol safety case (small aircraft) 1 IALLBG Grizzly Grip - Clamp-on Bracket for Hilting Poles 1

Read Carefully the entire label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to read. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941 (2327)

Stay alert

UDAP's "Shoot from the Holster" designs.

Be Prepared in Bear Country

Mark Mothery a grizzly bear attack survivo

Bear Attack

Mark Mathen, was attacked by a female grizzly bear on a main trail. In less than half a minute the crizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the normalm. and also to the left anterior chest. This bear attack is what motivated Mark to establish

Be Prepared in Bear Country

For a limited time, the safety wedge will glow in the dark.

To prevent loss, the safety wedge is attached to the handle, please leave att

Appendix B

Page 4

30 FOOT FOG

DIRECTIONS FOR USE It is a violation of Federal law to use this product in a manner inconsistent with

its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

It is a product may be used only to deter bears.

Do not seek out encounters with bears or intervionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety dip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and langs. Individuals who suffer from astrona or emphysionia may have a more severe reaction

This product has a range of up to 30 feet (9 meters).

This carister empties completely in approximately 4 seconds [225g costainer] 5.4 seconds [260g container].

APPLICATION DIRECTIONS: Special procedures must be believed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test fire this container, do so with your back to the wind in an area away from people and bears. Do not ted for Papper Pawer in an once when you plan to comp, hunt, hise, or lish. Do not textire for more than a half a second. After textiling, dean

nozde and can with susp and wave to remove residue. If you have not used this product before, you should obtain a LOMP training can and produce with it until you can perform, quickly and accurately, the activities described in the column below.

describes in the continuence.

10 And Med. InPLY: Place forelarger strough loso in bandle with disunction coil of safety cap [Fig. 1]. Width thunds, put safety risp up and stronger back Time will expose the trapper lever. Depress trigger lever will should, refereing a 1 second tenst of spray (Fig. 2). This strough or content of some stronger lever with should, refereing a 1 second tenst of spray (Fig. 2). from reaching you). Be aware that wind at rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is cuite close before spraying. If the bear makes it strough the initial burst of spray, continue spraying, among for the face. Shield your eyes and face if you must face the

Replace safety clip as illustrated [Fig. 3].







UDAP'S HOLSTERS Shoot from the Holster

designs, providing silent and easy access to the trigger.

Chest holster can be converted to a hip holster.

Hip Holster

Chest Holster



0 NOT store in Hot vehicle or = direct sunligh

Carefully

the entire label upon purchase

Most Bear Attacks Involve a Mother with Cub(s)

BEAR IN MIND

Deter Bears from Attacking Humans

DIRECTIONS:

Hold chest holster upright. facing away from the body at chest level. Unbuckle bottom strap. Put left ann and head through top strap and place strap on shoulder. Wrap bottom strap around midsection and reattach budde. Adjust straps to desired fit.









bage 6

Contents 7.902/2259

#15Cb ITEM

Fits Chest Sixes 32" to 54"

Chest Holster



ITEM #15CP



UDAP Industries Inc. 13160 Yonder Rd. Bozeman, MT 59718 1-800-232-7941

Hiw



225 Bear Spray with Chest Holster



Chest Holster HIM Fits Chest Sizes 32" to 54"

Bear Spray Wagnum

Contents 9.2oz/260g

#12CP

.zo \$1

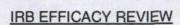
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#15CP Magnum Spray with Chest Holster



UDAP Industries 13160 Yonder Rd. Bozeman, MT 59718 1-800-232-7941

.8 xibneqqA



DP Number(s)

IN: 12/4/06 OUT: 12/14/06

PRODUCT NO.: 72007-1

DATE RECEIVED BY OPP: 9/25/06

DATE OF SUBMISSION: 10/6/06

DATE SUBMISSION ACCEPTED: 12/4/06

TYPE OF PRODUCT: Repellent

DATA MRID NO.: 469516-01

PRODUCT MANAGER NO.: 07

PRODUCT NAME: UDAP PEPPER POWER BEAR DETERRENT

COMPANY NAME: UDAP Industries, Inc.

SUBMISSION PURPOSE: Add container size; amend label

CHEMICAL & FORMULATION: 2.0% Capsaicin and related capsaicinoids



00

Efficacy Review: UDAP PEPPER POWER BEAR DETERRENT, 72007-1

UDAP Industries, Inc. Bozeman, MT 59718

200.0 INTRODUCTION

200.1 <u>Uses</u>

A 2.0% Capsaicin and related capsaicinoids aerosol formulation Federally registered for use "only to deter bears which are attacking or appear likely to attack humans."

200.2 Background Information

See registration jacket, including efficacy reviews of 1/25/99, 3/9/99, 3/16/99, 12/27/99, 9/5/00, 3/25/03, 10/23/03, and 3/22/04 and the various discussions concerning appropriate content for labeling. This product was registered (as 71920-1) to Guardian Products of Phoenix, AZ, on 3/16/99, with UDAP becoming a distributor for it shortly thereafter. This product's registration was transferred to UDAP effective 3/6/03. The current labels for this product's retail packaging were accepted by OPP on 12/4/03. On 7/19/04, OPP accepted a version of the "Bear Safety Tips" brochure that often accompanies this product in commerce.

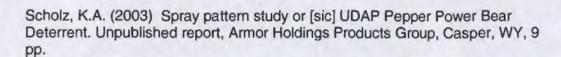
This review addresses UDAP's submission of 9/25/99 which consists of a cover letter from company President Mark Matheny, an amendment application form, a proposed revised canister label, a report of spray pattern and spray evacuation studies, and a video disk showing spray pattern and spray evacuation trials.

For an aerosol bear deterrent, the spray performance of each canister size must be documented before the container is accepted for the product. The efficacy review of 1/25/99 discussed the spray pattern study report submitted prior to this product's registration. That report included results for 180-g (~6.4 oz, by weight), 225-g (~8 oz.), and 260-g (~9.2 oz.) canisters. Subsequently, EPA accepted use of the Guardian product (BearGuard) in 225-g and 260-g containers. The efficacy review of 12/27/99 discussed additional spray pattern data for a 180-g container that UDAP wanted to sell for its distributor version of the Guardian Product. In both sets of trials with the 180-g container, the time to total evacuation of container was well under 4 seconds, which OPP concluded to be inadequate for the safety of users of this type of product. The new container that UDAP proposes for 72007-1 is to be 380-g (13.4 oz.) by weight.

201.0 DATA SUMMARY

No change to the product's formulation is reported in the pending submission.

The spray pattern report is cited and discussed below.



MRID# 469516-01

Scholz also was the author of the spray pattern reports submitted by Guardian when they were the applicant and registrant for this product.

The Scholz (2006) document essentially is a copy of a research protocol with data inserted at relevant points. Implications are that trials were run following the intended procedures described by the protocol and that the data entered are the results of the trials. The trials were to be run indoors under "wind <3mph" [sic]. Trials were to have been "recorded on video". The DVD included in the submission of 9/25/06 evidently captured the performance of some or all of the trials reported plus others with a 180-g container. Those trials were conducted within a metal-walled building.

For the distance and distribution trials, containers of product were to be fired toward targets made of white "freezer" paper (presumably situated perpendicular to the line of fire and to the substrate, as in Scholz's earlier trials). Distances between unit and target were to have been 5', 10', 15', 20', 25', 30', and 35'. At each distance, spray pattern was to be determined by vertical and horizontal measurements of the height and width, respectively, of deposited product.

From the data inserted into the Scholz (2006) document, it appears that one container was tested at each of the 7 fixed distances mentioned in the previous paragraph in this review. The height and width results (presumably measured to the nearest full inch) and calculated mean diameters of spray pattern are summarized in the table shown immediately below.

Distance from Target	Height	Width	Average Diameter 22.5" 55.5"		
5'	30"	21"			
10'	66"	45"			
15'	90"	55"	72.5"		
20'	96"	108"	102"		
25'	91"	105"	98"		
30'	91"	114"	102.5" 107.5		
35'	92"	123"			

These data are not inconsistent with an effective spraying distance of 35 feet.

The DVD shows and describes spray pattern testing of 180-g canisters at 5', 10', 15', 20', 25', and 30' and testing of 380-g canisters at 5', 10', 15', 20', 25', and 35', but not at 30'. The results measured on the DVD for the 380-g unit generally are consistent with those included in the report, but there is no evidence on the DVD that the 380-g model was tested at 30'. It is possible that such a test was



conducted later or was not recorded. (At least one of the study participants coughed a lot during the test, perhaps due to product-related distress; and the testing may have been foreshortened for that reason. Both participants shown on the DVD were wearing gas masks.)

Trials of spray duration were to be run separate from the spray distance and distribution trials. Spray duration trials were to involve stopwatch timing from the onset of firing "until ceases to deliverable a useable pattern" rather than timing from onset of firing to cessation of container hissing. Scholz's approach clearly was intended to determine the duration of a spray believed to be able to target an attacking bear.

From the data inserted into the Scholz (2006) document, it appears that evacuation times of 7.43, 6.70, and, 7.67 seconds were determined for three 380-g canisters. Such results would be reasonably consistent with a claim of 7 seconds of spray duration. The DVD shows trials with the 380-g model being timed to durations of 7.43, 6.70, and 7.67 seconds. Evacuation trials with 180-g units produced times of 3.62, 3.67, and 3.87 seconds.

As noted above, Scholz (2006) does not report on how these trials were conducted but rather on the procedures that were to be followed. The results reported are inserted as typed figures, and there are no raw data sheets. However, the DVD provides a record of the trials as they were conducted and, except for the absence of a 30' test for the 380-g container and one minor (4") discrepancy in the height of the pattern at 25', completely corroborates the data in the report by Scholz (2006).

Registrants of bear pepper sprays tend to talk up data on spray pattern and duration for their products and to paint such results in any favorable light possible relative to competitors' product. Consequently, it is important that any claims permitted be supported, fair, and conservative.

On the proposed revised label, UDAP claims an effective spraying distance "of up to 35 feet (11 meters)" for all containers and a spray durations of

approximately 4 seconds [225g container], 5.4 seconds [260g container], and 7.26 seconds [380-g container].

The distance claim on the current accepted label, which applies to the 225-g and 260-g canisters, is "up to 30 feet". As noted in the efficacy review of 1/25/99, two attempts with such containers at the 35' distance yielded essentially clear targets. Nothing in the Scholz's (2006) data for 380-g containers would change the results previously obtained with the smaller containers, and it must be remembered that Scholz's (2006) reported result at 35' represents the performance of a single 380-g canister. At this time, the 35' claim only should be considered for acceptance for the 380-g container. (Qualitatively, the trials depicted on the DVD suggest that amount of propellant in the 380-g container provides more oomph than what is in the 180-g canister.)

¹ For the first of these times, the tester/timer announced the time on his watch as 7.43, but another participant said 7.23. Clearly, the time on the watch would be correct.



The spray duration data for the 380-g container are consistent with a claim of "approximately 7 seconds." The proposed figure (7.26 seconds) is close to the mean of the 3 results reported but is not an approximate figure. However, that one of the 3 results obtained was 0.3 seconds short of 7 seconds means that going beyond 7 seconds for the "approximately" claim would be over-promising. The spray duration numbers on the labels for the 225-g and 260-g canisters were derived from tests of a single container of each size (see efficacy review of 1/25/99).

Except for the aforementioned items, the proposed revised canister label for 72007-1 appears to be consistent with the label accepted on 12/4/03.

202.0 CONCLUSIONS

- 1. The spray duration results reported for the 380-g (13.4-g) container are consistent with a claim of "approximately 7 seconds". That is the longest spray duration claim that should be considered based upon the data submitted, which included one container that timed out at 6.70 seconds.
- The effective spray distance data reported for the 380-g container are consistent with a claim of 35 feet, but the data apply only to the 380-g container.
 For the 225-g and 260-g containers, the claim of effective spray distance must remain at 30 feet.

William W. Jacobs Insecticide-Rodenticide Branch December 14, 2006





B:11 Jacobs

Decision #: 371169

DP #: (334699)

DATA PACKAGE BEAN SHEET

Date: 04-Dec-2006 Page 1 of 1

Jackets Imaged Registration Information * Registration: 72007-1 - UDAP PEPPER POWER BEAR DETERRENT Company: 72007 - UDAP INDUSTRIES INC. Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# PY1 S-7227 Risk Manager Reviewer: Daniel Peacock DPEACOCK Sent Date: Calculated Due Date: 13-Mar-2007 Edited Due Date: Type of Registration: Product Registration - Section 3 Action Desc: (R34) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMEN Ingredients: 070701, Capsaicin(2%) * * * Data Package Information * * * Expedite: () Yes () No Date Sent: 04-Dec-2006 Due Back: DP Ingredient: 070701, Capsaicin DP Title: CSF Included: () Yes (No Label Included: Yes No Parent DP #: **Assigned To** Date In **Date Out** Organization: RD / IRB Last Possible Science Due Date: 11-Feb-2007 Team Name: Science Due Date: 12/11/00 Reviewer Name: Sub Data Package Due Date: Contractor Name:

* * * Studies Sent for Review * * *

No Studies

* Additional Data Package for this Decision * * *

No Additional Data Packages

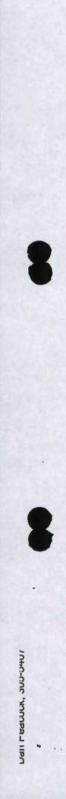
Data Package Instructions * * *

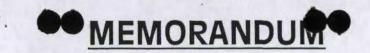
FFS Date: March 13, 2007

Bill,

Please review UDAP's request for a 13.6 oz of bear spray. We have previously approved sizes of 7.9 and 9.2 oz. Co has submitted data in print form (MRID No. 469516-01) and on a DVD. I have enclosed the following documents with this action:

- 1. application form
- 2. cover letter
- 3. proposal label
- 4. data
- 5. DVD





DATE: 10	17/06
TO:	PH 07 , Regulatory Manager
FROM: Info	ormation Services Branch, ITRMD
indication	eceipt of this data submission is not an that MRIDs for the enclosed studies posted in OPPIN.
	pect that it will be approximately 5 day bove date before the study-level data in OPPIN.
	nave any questions about this process, tact Teresa Downs (305-5363).
This is a:	☐ fully accepted submission☐ partially accepted submission☐ rejected submission☐



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 11, 2006

Due 2-24-

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

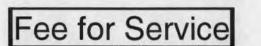
UDAP INDUSTRIES INC. 13160 YONDER ROAD BOZEMAN, MT 59718-

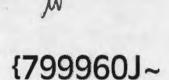
Dankerrews

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 06-OCT-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.





This package includes the following

New Registration

- Amendment

Studies? Fee Waiver?

volpay % Reduction: ____

for Division	
AD	
BPPD	
• RD	
Risk Mgr.	7

Receipt No.

EPA File Symbol/Reg. No.

Pin-Punch Date:

S-799960

72007-1

10/6/2006

This item is NOT subject to FFS action.

Action Code:

Requested:

R34

Granted:

R34

Amount Due: \$ 3150

Parent/Child Decisions:

Reviewer: Lung Eugle

Date: 10.10.06

Remarks:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 10, 2006

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-371169

EPA File Symbol or Registration Number: 72007-1

Product Name: UDAP PEPPER POWER BEAR DETERRENT

EPA Receipt Date: 06-Oct-2006 EPA Company Number: 72007

Company Name: UDAP INDUSTRIES INC.

Tim Lynch UDAP INDUSTRIES INC. 13160 YONDER ROAD BOZEMAN, MT 59718-

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R34

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENTS; SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Please remit payment in the amount of: \$ 3,150 to:

By USPS:

USEPA Washington Finance Center Pesticide Registration Service Fee PO Box 360277 Pittsburgh, PA 15251



U.S. EPA Washington Finance Center Pesticide Registration Service Fee C/O Mellon Client Service Center 500 Ross Street, Room 670 Box 360277 Pittsburgh, PA 15251-6277 Attn: EPA Module Supervisor

Attn: EPA Module Supervisor Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is soley associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how th request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 305-6249.

Front End Processing Staff

Sincerel

Information Technology & Resources Management Division

UDAP Industries Inc.
EPA Registration Number 72007-1
Amendment to add a new size canister



September 25, 2006

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C) Office of Pesticide Programs, EPA 1921 Jefferson Davis Highway Arlington, VA 22202

RE: UDAP Pepper Power Bear Deterrent EPA Registration Number 72007-1 Application for an amendment to add new Canister size

Dear Mr. Peacock:

UDAP Industries Inc. with this letter submits an application for the following amendment to the above registered product. The amendment is to add a new canister size to the product line UDAP Pepper Power Bear Deterrent.

UDAP Industries Inc. wishes to register an additional size of the brand UDAP Pepper Power Bear Deterrent EPA Reg. No. 72007-1. The size is a 380-gram canister. The formula will not change for this size and will remain the same as the registered product other than the size. UDAP Industries Inc. had testing done for the additional size to determine the spray pattern dimensions at varying distances, duration of can output measured in seconds, and maximum range. UDAP Industries Inc. will provide a label of the proposed size (See Appendix A) along with results from the testing done (See appendix B) including a DVD video of the testing.

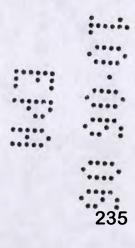
UDAP Industries Inc. also wishes to advertise the test results done by Defense Technology / Federal Laboratories of the proposed size in literature, presentations, and on websites. This is for educational purposes and for public safety. The advertisements will be in the same format as the test results submitted with this amendment.

In support of the Amendment, enclosed you will find the following:

- Two Applications (EPA Form 8570-1).
- 2.) Two Copies of this letter attached to the applications
- 3.) Five Copies of the label for new proposed 380-gram size. (See Appendix A)
- Three copies of Laboratory Test results concerning the two new sizes. (See Appendix B)
- 5.) One ten-minute bear spray test DVD video.

Sincerely,

Mark Matheny President UDAP Industries





Print Form

Form Approved. OMB No. 2070-0060, Approval expires 2-28-

SEPA

United States

Environmental Protection Agency

	Registration
×	Amendment
	Other

OPP Identifier Number

V-1/1	Washing	gton, DC 204	60		Other			
	P	pplicatio	n for Pesticio	le - Sec	tion I			
1. Company/Product Number 72007-1				2. EPA Product Menager Dan Peacock			roposed Classification	
4. Company/Product (Name) UDAP Pepper Power Bear Deterrent			PM#	PM#			None	
5. Name and Address of Applicant (Include ZIP Code) UDAP Industries Inc. 13160 Yonder Road Bozeman, MT 59718 Check if this is a new address			(b)(i), m to: EPA R	6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: 72007-1 EPA Reg. No. UDAP Pepper Power Bear Deterrent Product Name				
			Section - I					
X Amendment - Explain below. Resubmission in response to Age Notification - Explain below. Explanation: Use additional page(s) if UDAP Pepper Power Bear Deterren	necessary.	. (For section		Agency lett "Me Too"	d labels in repsons ter dated Application. Ilain below.	e to		
Application for an amendment to ad 1. Material This Product Will Be Package		ze canister (Please see attached					
Yes Van No. per		No. per container	Water Soluble Packaging Yes Text If "Yes" No. per Package wgt container			of Container Metal Plastic Glass Paper Other (Specify)		
3. Location of Net Contents Information	Location of Net Contents Information 4. Size(s)		Retail Container 5.		On Label	Location of Label Directions On Label On Labeling accompaning product		
6. Manner in Which Label is Affixed to P	roduct	Lithogr Peper Stenci	reph glued led	Othe		ing accom	paning product	
			Section - I\	1				
Contact Point <i>(Complete items direct</i> Name Tim Lynch	ly below fo		n of individual to be Title General Manager	contected,	if necessary, to p		ne No: finalede Area Code)	
I certify that the statements I have I acknowledge that any knowlings both under applicable law.		nisleeding sta	all attachments the tement may be pun 3. Tide	ishable by f			6. Date Application Received (Stamped)	
4. Typed Name Tim Lynch		-	General Manager 5. Date September 25, 2006				236	

